

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Special Agent Eric D. Poalino, having been sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since June 2021. I am currently assigned to the Boston Field Office, North Shore Gang Task Force (“FBI Task Force”). The primary mission of the FBI Task Force is to identify, investigate, disrupt, and dismantle violent criminal organizations operating in cities north of Boston. My responsibilities include the investigation of possible violations of federal law, including illegal possession/transfer of firearms, firearms trafficking, narcotics trafficking, and violent crimes involving firearms and narcotics trafficking. I have received training and experience in various aspects of criminal law and procedure, including electronic and physical surveillance, interrogations, stops, searches, seizures, and arrests for a variety of criminal offenses. Through my training, knowledge, and experience, I have become familiar with the habits, methods, routines, practices and procedures commonly employed by persons engaged in the use and trafficking of illegal firearms and narcotics, including persons involved in criminal organizations. My investigations have included the use of surveillance techniques and the execution of search, seizure, and arrest warrants.

2. I have written and/or participated in the execution of numerous search warrants resulting in the seizure of controlled substances and paraphernalia involved in the manufacture and distribution of controlled substances; United States currency, records of narcotics and monetary transactions, drug customer lists and other documents relating to the manufacturing, transportation, ordering, purchasing and distribution of controlled substances, as well as the collection, expenditure, accounting, transportation, and laundering of drug proceeds. I have participated in the debriefing of numerous defendants, informants and witnesses who had personal knowledge regarding large-scale narcotics trafficking organizations. I have participated in all aspects of drug investigations including conducting surveillance, executing searches pursuant to court-ordered search warrants, executing arrests, and participating in court-authorized Title III wiretaps of cellular phones. I have received extensive specialized training in the field of controlled substance identification, investigation and enforcement. Based on my training and experience, I am familiar

with narcotics traffickers' methods of operation, including methods used by them to distribute, store and transport narcotics and to collect, expend, account for, transport, and launder drug proceeds.

3. All dates, time and amounts set forth in this affidavit are approximate. Because this affidavit is being submitted for the limited purpose of securing the requested search warrants, I have not included each and every fact known to me concerning this investigation. I make this affidavit based upon personal knowledge derived from my participation in this investigation and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including, but not limited to, the following:

- a. My training and experience investigating drug trafficking, violent crimes, and money laundering crimes;
- b. Oral reports, written reports, and documents that I have received from other federal, state, and local law enforcement agents;
- c. Physical and electronic surveillance conducted by me and other federal, state, and local law enforcement officers;
- d. Confidential sources of information and cooperating witnesses;
- e. Public records;
- f. Business records;
- g. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- h. Precise location information for cellular telephones;
- i. Queries of law enforcement records and intelligence databases;
- j. Execution of search warrants;
- k. Social media postings, videos and images;
- l. Review of data and information obtained by Orders issued under 18 U.S.C. Section 2703(d), and Search Warrants;
- m. Review of cellular phones searched and seized during this investigation; and

- i. Arrests of co-conspirators.

I. PURPOSE OF AFFIDAVIT AND BACKGROUND

4. I make this affidavit in support of an application for Criminal Complaint charging SCHUYLER OPPENHEIMER, a/k/a “SK”, a/k/a “Michael Sylvain”, with the following:

- a. On or about July 18, 2024, Possession with Intent to Distribute 500 Grams or More of a Mixture and Substance Containing Methamphetamine, in violation of 21 U.S.C. § 841(a)(1);
- b. On or about April 2, 2021, Wire Fraud, in violation of 18 U.S.C. § 1343, relating to a fraudulent PPP loan application made by OPPENHEIMER to the Small Business Administration, specifically SBA Loan #: 2244928807 that was transmitted by electronic signal over the internet; and
- c. On or about April 13, 2021, Wire Fraud, in violation of 18 U.S.C. § 1343, relating to a fraudulent PPP loan application made by OPPENHEIMER to the Small Business Administration, specifically SBA Loan #: 5859658907 that was transmitted by electronic signal over the internet.

5. The FBI Task Force, supported by Massachusetts State Police, Drug Enforcement Administration, Homeland Security Investigations: Customs and Border Patrol, and United States Postal Inspection Service are investigating Schuyler OPPENHEIMER, a/k/a “SK,” a/k/a “Michael Sylvain” (“OPPENHEIMER”). I am familiar with SCHUYLER OPPENHEIMER, who has a date of birth of xx/xx/1990.

6. OPPENHEIMER is known to be a current and historical large-scale manufacturer and supplier of pressed pills containing fentanyl and methamphetamine. I am aware that OPPENHEIMER is skilled in the mechanical processes involved in the physical production of counterfeit pills, and also the compounding and adulteration of the controlled substances used in the counterfeit pill production process. Moreover, OPPENHEIMER is believed to historically have been a technician for other large-scale pill producers in Massachusetts, such as Vincent CARUSO, a/k/a “Fatz”, who was charged in 2021, and has since pleaded guilty and was sentenced for operating a large-scale drug trafficking organization specializing in the distribution of pressed fentanyl pills.

7. The investigation has revealed that OPPENHEIMER also has skill and expertise in advanced chemical processes related to controlled substance production. In particular, this affidavit makes

clear that OPPENHEIMER has undertaken efforts to source and procure fentanyl precursor chemicals and import them into the United States in bulk quantities.¹ Such precursor chemicals can be used to synthesize fentanyl and other synthetic opioids in clandestine laboratories.

8. OPPENHEIMER has a number of prior felony convictions and numerous arrests for crimes of violence, robbery offenses, drug offenses, and firearms offenses. Based upon review of court papers, and criminal record information, I am aware that OPPENHEIMER's criminal record includes the following:

- Cambridge District Court, Docket No. 0752CR003651, charging Armed Robbery and Possession of a Class D substance, which was dismissed on March 12, 2008.
- Cambridge District Court, Docket No. 0852CR000674, charging unarmed robbery, possession of a class D substance, and assault and battery by means of a dangerous weapon, which was dismissed in June of 2008.
- Cambridge District Court, Docket No. 1052CR00376, charging assault to murder, discharging a firearm, and possession of a firearm without FID, which was dismissed on July 1, 2010
- Middlesex Superior Court, Docket No. 20081484, charging unarmed robbery, and stealing by confinement, which resulted in a not guilty verdict on August 9, 2010
- Brookline District Court, Docket No. 1108CR00257, charging possession of a class A substance, which was dismissed on October 18, 2012
- Waltham District Court, Docket No. 1151CR000520, charging possession to distribute a class D substance, possession of a class B substance, possession of a class A substance, operating after suspended license and failure to identify. On June 30, 2011, OPPENHEIMER admitted to sufficient facts for this case and was placed on probation. After a violation of probation, a guilty finding was entered on December 26, 2012, and probation was terminated.
- Dorchester District Court, Docket No. 1107CR03335, charging possession of ammunition without FID card, and possession of a counterfeit note. On February 3, 2012, OPPENHEIMER was convicted of these offenses and placed on probation. After a violation of probation, OPPENHEIMER was sentenced to 1 year in the house of correction.

¹ Fentanyl precursor chemicals refer to the basic or parent chemicals that form fentanyl and can include 4-anilino-Nphenethylpiperidine (4-ANPP) and norfentanyl. Fentanyl precursor chemicals can also be manufactured with dual use and designer pre-precursor chemicals such as 4-anilinopiperidine (4-AP), N-Phenethyl-4-piperidinone (NPP), and benzylfentanyl.

- Middlesex Superior Court, Docket No. 2012403, charging trafficking in heroin over 14 grams, trafficking in cocaine over 14 grams, possession to distribute a class B substance, two counts of school zone violations, receiving stolen property, improper storage of a firearm, possession of a firearm, possession of ammunition, possession of a large capacity firearm, reckless endangerment of a child, and use of a firearm in furtherance of a felony. On December 3, 2013, OPPENHEIMER was convicted of these offenses and sentenced to 4 to 5 years in state prison, and a period of probation that has since concluded.
- Rhode Island 6th Division District Court, Case No. 61-2024-00530, charging Domestic Violence - Criminal Violation of No Contact Order - 1st Offense. The date of offense for this case is January 15, 2024. This case remains pending and OPPENHEIMER has been on pretrial release for this matter since March 13, 2024.
- East Boston District Court, Docket No. 2405CR000610, charging Violation of Abuse Prevention Order. The date of offense for this case is believed to be May 24, 2024. This case is pending and OPPENHEIMER has been on pretrial release for this case since May 24, 2024.
- Malden District Court, Docket No. 2450CR001038, charging Violation of Abuse Prevention Order. OPPENHEIMER was arrested on this matter on June 7, 2024. This case is pending and OPPENHEIMER has been on pretrial release for this case since June 10, 2024, subject to home confinement. I note that I am aware at his arraignment on this matter, the prosecutor sought OPPENHEIMER's detention for violating conditions of release on the pending East Boston case. This motion was denied and OPPENHEIMER was released on or about June 10, 2024, subject to further conditions, including home confinement.

9. As noted, as of July 18, 2024, OPPENHEIMER is currently on pretrial release for three pending cases. The conditions of pretrial release for the most recent Massachusetts arrested that he is subject include home confinement, and an obligation to not commit any other crimes.

II. BASIS FOR PROBABLE CAUSE

A. 12 OAKLAND AVENUE, EVERETT, MA

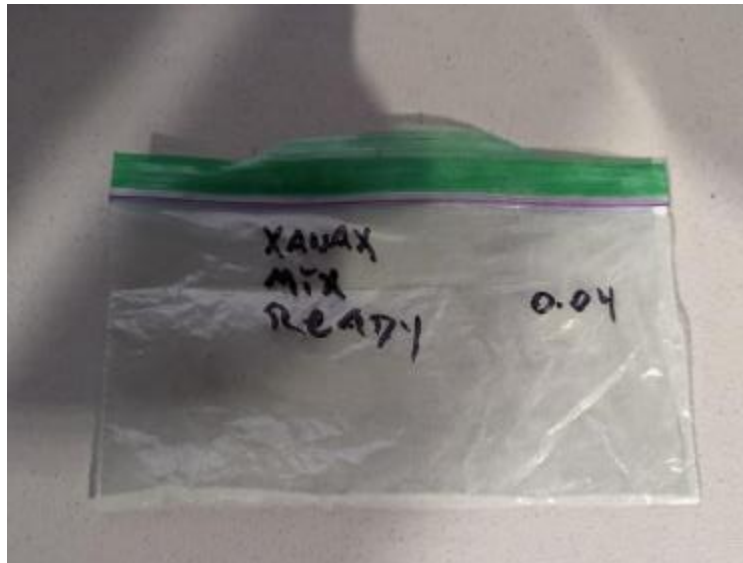
10. During the investigation, OPPENHEIMER was known to reside at 12 Oakland Avenue, Everett, Massachusetts from approximately 2022 through August of 2023. The premises is a single-family residence that OPPENHEIMER rented individually. There were no other apartments or units associated with the location. The premises also had a basement that was accessible to OPPENHEIMER, and that is

where OPPENHEIMER is believed to have historically manufactured pressed pills containing fentanyl and methamphetamine.

1. JULY 7, 2022, TRASH PULL

11. On July 7, 2022, investigators conducted a trash pull of garbage left on the sidewalk for collection outside of 12 Oakland Avenue, Everett, Massachusetts. Investigators located the following:

- A National Grid gas bill addressed to SCHUYLER OPPENHEIMER.
- A collection of small plastic bags with white powdery residue. One bag was labeled "Xanax Mix Ready" in handwritten marker. A photograph of this bag follows:



- A pair of black latex gloves covered in orange powder.
- White Pill Marked "Xanax".
- Multiple black trash bags.
- A re-sealable plastic bag containing powder residue with a bluish hue, consistent with the packaging of fentanyl pills.
- Drug Packaging with Orange Coloring (Evidence #1B6, FBI Lab Item 6 and 7).

12. Investigators believe that these items are indicative of manufacturing pressed pills containing controlled substances. The FBI laboratory analyzed the items recovered on July 7, 2022, and reported that methamphetamine and fentanyl was identified within some of the seized items.

2. AUGUST 31, 2022, TRASH PULL

13. On August 31, 2022, investigators conducted a trash pull of garbage left on the sidewalk for collection outside of 12 Oakland Avenue, Everett, MA. Inside the garbage collected from 12 Oakland Avenue, investigators located numerous items believed to be associated with the manufacturing of pressed pills. The recovered items included the following:

- a. A cardboard box containing over 30 black, individually sealed packets marked "Big Fire," containing blue powder. The product description detailed on the packaging claimed that it would turn flames blue when poured into a fire. The packaging also included numerous health warnings if the powder were to be ingested, inhaled, or exposed to the eye. The powder is suspected to be a cutting agent or coloring used in the production of pressed fentanyl pills commonly referred to as "Blues."
- b. Numerous re-sealable plastic bags with the sealing portion cut off. Investigators know the use of bags altered in this manner is consistent with a common technique used to package illegal drugs.
- c. Two black trash bags containing blue powder.
- d. Five blue pills stamped with "M" and "30," resembling 30 milligram Percocet pills. Investigators know that pressed fentanyl pills are often marketed as Percocet in an attempt to mislead drug users into believing the product is safer and of a higher quality. These pills were tested at the FBI lab and determined to contain fentanyl. A photograph of the recovered pills follows:



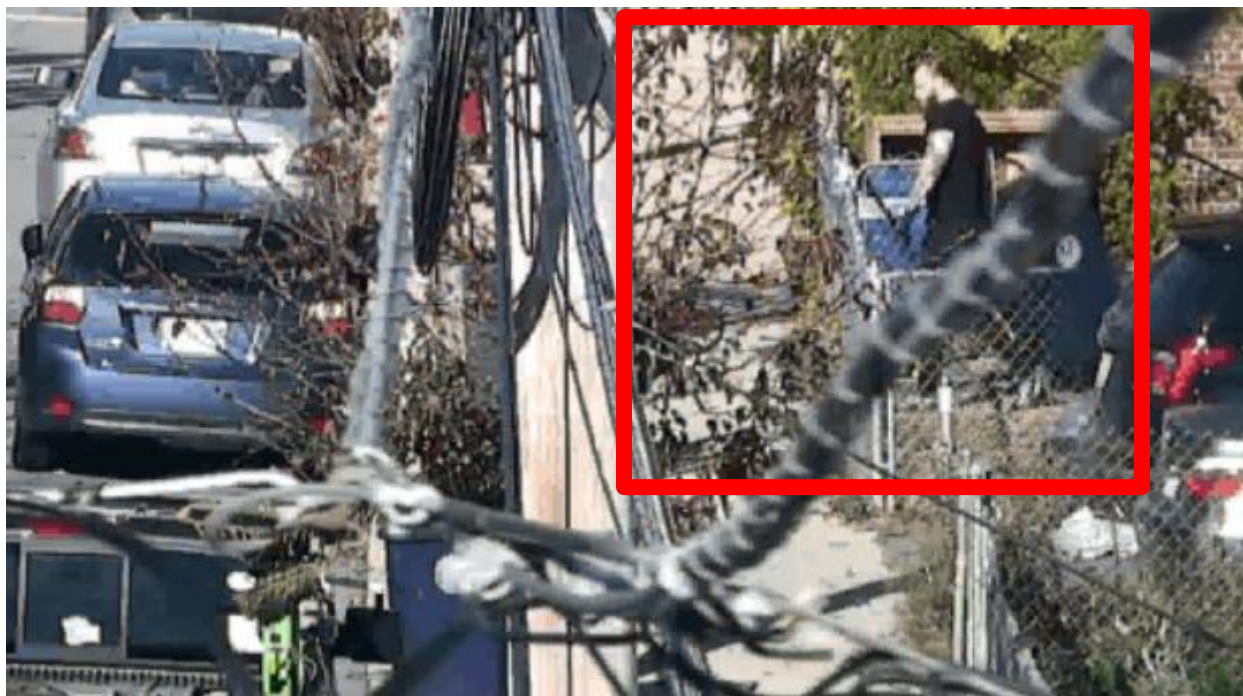
- e. A plastic heat-sealed bag suspected to have contained raw narcotics.
- f. Approximately 11 pairs of what appeared to be black latex gloves covered in blue powder.

- g. A small yellow envelope with a bubble wrap interior lining. "RP 30" is written on one side of the envelope in black marker. Investigators know that legitimate pills with the imprint "R P 30" are white, round, and contain Oxycodone Hydrochloride 30 mg.
- h. Clear plastic re-sealable bags and two small plastic cups. The plastic cups had blue and orange residues tested by the TruNarc Analyzer with inconclusive results. One plastic bag was marked with "EXTRA 225" in black marker. Another plastic bag had a bluish hue. This bag was marked with words "Filler 142g Blue."

3. NOVEMBER 2, 2022, TRASH PULL

14. On November 2, 2022, investigators conducted a trash pull of garbage left on the sidewalk for collection outside of 12 Oakland Avenue, Everett, MA. Investigators observed OPPENHEIMER place the trash in the barrels and move them to the curbside. Still images from remote surveillance show OPPENHEIMER placing bags into the barrels:





15. Inside the garbage collected from 12 Oakland Avenue, investigators located numerous items associated with the manufacturing of pressed pills, including pills, documents, recipes for pill manufacturing, a ledger, masks and respirators, bags and packaging. Those recovered items include the following:

- Numerous used gloves, and box of nitrile exam gloves;
- A notebook that contained a number of pages containing recipes for various pills;
- Various items of personal protection equipment to include masks, respirators, gloves, and a resuscitation device (image below);



- Gears
- A large clear bag containing blue powder (1B25), tested by the DEA laboratory to contain methamphetamine;
- A pill press die (image below);



- Two blue pills and blue powder (1B27), tested by the DEA laboratory to contain fentanyl;
- A plastic bag with orange powder (1B28), tested by the DEA laboratory to contain methamphetamine;

- 5 orange pills (1B30), tested by the DEA lab to contain methamphetamine (image below);



- A broken blender with orange residue (image below);

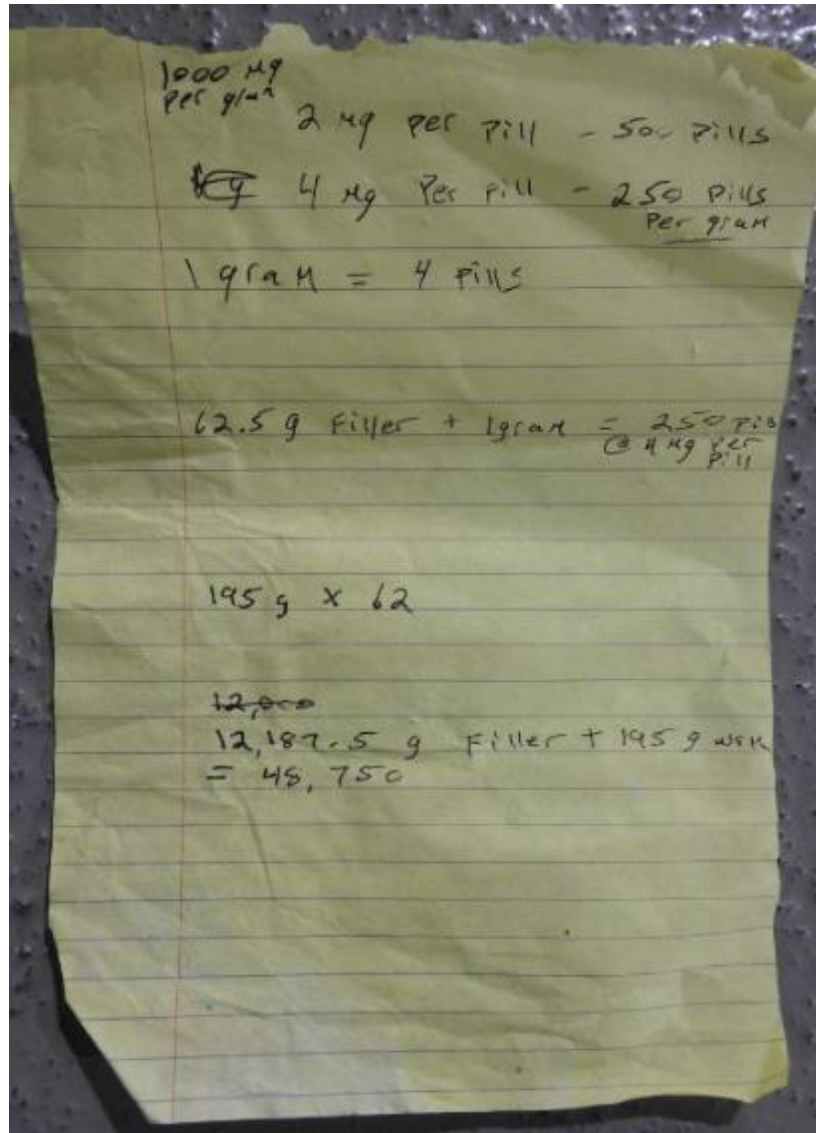


- Plastic bag with green residue (1B31);
- Two Plastic bags containing pink powder (1B29), one of which was tested by DEA laboratory to contain fentanyl and weigh more than 50 grams (image below).



16. Among the documents recovered was a notebook and loose papers containing pages of handwritten notes that contained what appeared to be recipes for various pill types, and worksheets for quantities to be produced.

17. For example, one document appeared to list out a recipe listing alternative additive quantities: the first being for “2 mg per pill” resulting in 500 pills per gram, or “4 mg per pill” which equates to 250 pills per gram. Investigators believe this calculation relates to the amount of fentanyl to be added per pill. In the same document, calculations can be seen for amount of “filler” to be added to the controlled substance. The document lists “62.5 g Filler + 1 gram = 250 pills @ 4 mg per pill”. Further down the document, it states “12,187.5 g Filler + 196 g work = 48,750”. Investigators believe that this second calculation reflects the calculation of approximately 12 kilograms of ready mix “filler” and 195 grams of fentanyl, which would equate to a total amount of 48,750 pills. A photograph of this worksheet follows:



18. Another document appeared to be an invoice for a purchase by Schuyler OPPENHEIMER from Le Melange LLC shipped to Schuyler Oppenheimer at 12 Oakland Avenue, Everett, Massachusetts. The invoice was dated October 3, 2022 and was for the purchase of 15 kilograms of “Firmpress” which is a ready-mix tablet additive for pill production. A photograph of the invoice follows:

Le Melange LLC
Lake Worth, FL 33449
www.lmelange.com
sales@lmelange.com

Sales Receipt

DATE: 10/3/2022		ORDER NO: 220486	
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SOLD TO		SHIP TO	
Schuyler Optimization 12 Oakland Ave. Exeter, MA 02119		Schuyler Optimization 12 Oakland Ave. Exeter, MA 02119	

CHECK NO.	PAYMENT METHOD	SHIP VIA	FOB
	MasterCard	UPS Ground	Lake Worth FL

QTY	CODE	DESCRIPTION	COST EA.	TOTAL
✓ 1	FORM15KG	Firmpress (Microcrystalline Cellulose, Magnesium Stearate, Silica Di-Oxide, and Di-Calcium Phosphate) - 15 Kg (33 lbs.)	924.00	924.00
	Shipping Charge	Shipping Charge	76.24	76.24
	Handling	Handling and Packing Charge	3.00	3.00
Total				\$1,003.24

Thank you for your continued business! We appreciate your loyalty! :)

DISCLAIMER: WARNING: Le Melange LLC, its order(s) and employee(s) make no claims whatsoever for the effectiveness, safety, or otherwise of its products. We have not tested any of the products or formulations and it is entirely up to you, as the consumer. This information is provided without warranty of any kind or fitness for a particular use or purpose.

19. In the various items recovered from the trash were two large bags that contained labels from Le Melange that stated “FIRMPRESS PRE-MIX 16.5 Lbs. or 7.5 Kgs.” The label goes on to state: “Firm press is a complete mix for tablet making. Press harder for a firmer tablet and not as hard for a softer tablet. This product may be sweetened with our Di-pac for a “chewable” tablet. Contains: Microcrystalline Cellulose, Magnesium Stearate, Silica Di-Oxide, and Di-Calcium Phosphate) Le Melange LLC.” A photograph of the bags and a zoomed image of the label follow:



20. A notebook was recovered. This notebook listed the 2022 and 2023 calendar years, suggesting it was recently purchased.

21. One page of the notebook contained what appeared to be a ledger listing drug customers and amounts owed. For some customers it appeared that the ledger identified a total amount owed, broken down by price per pill. For other customers it listed a number of grams and total amount owed. Among the listed customers are entries for “Loso”, and “Blanco”. A photograph of the recovered ledger follows:

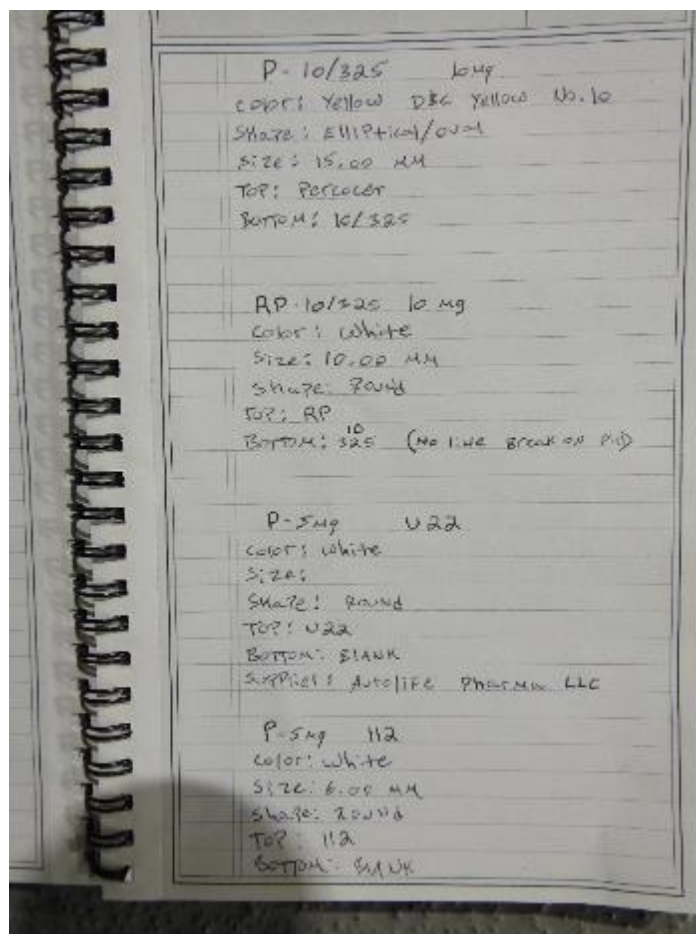
		\$ per
		500 \$5
		1,000 10
		50 15
KANG	5	500 7
BLANCO	100	1,000 10
JESS checker	50	750 15
DRAP	50	750 15
DRAP	5944	350 70
DRAP	50	500 10
N. COLE	20	500 20
JACOB	20	400 20
JACOB	500	200 50
Brian	50	600 12
LOSO	20	200 10
LOPE	100	500 5
LOSO	144	300
BANG	100	1,000 7
BEVER	50	250 5

22. Another series of pages contained what appeared to be instructions for the settings of a pill press to manufacture certain types of pills. The instructions, for example, listed “K9 – 30 mg” (oxycodone hydrochloride), “ALG 265 – 30 mg” (oxycodone hydrochloride), “A-215” (oxycodone hydrochloride), and

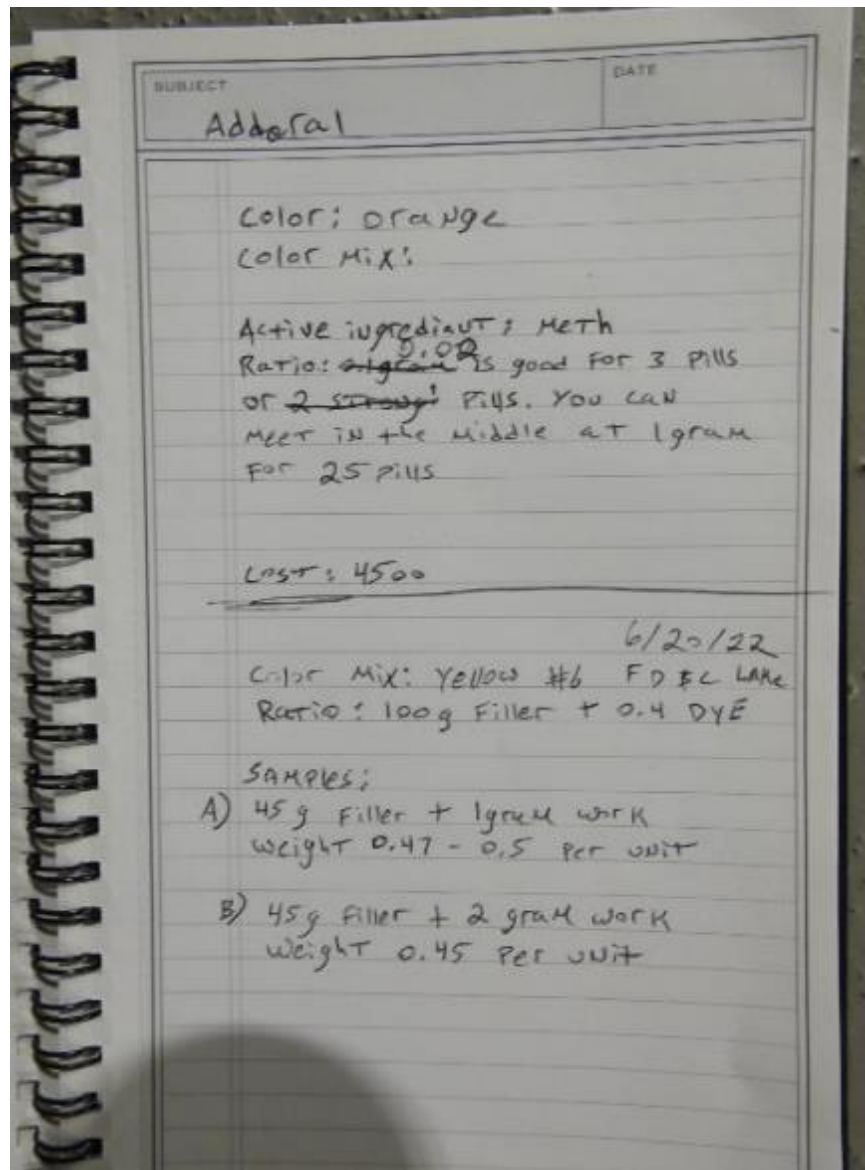
"M-30" (oxycodone hydrochloride) pills, and then states the color, size, dyes utilized, shape, top stamp, and bottom stamp to be used in order to replicate the authentic pill. The specific dye combinations are also listed so that the proper color can be achieved to imitate the prescription pill, such as "F D & C Blue No. 1" and "F D & C Blue No. 2". Photographs of some of these recipe pages from the notebook follow:

SUBJECT	DATE
Le Melange LLC	
K9 - 30mg	
Color: Blue FD&C Blue No. 2	
Size: 6.00 MM	
Shape: Round	
REDACTED TOP Side: K/9	
Bottom Side: BLANK	
ALG 265 - 30mg	
Color: Blue FD&C Blue No. 2	
REDACTED Color: D&C Yellow No. 2	
Size: 6.00 MM	
Shape: Round	
TOP: ALG 265	
Bottom: BLANK	
A-215	
Color: Blue	
Shape: Round	
Size: 6.00 MM	
TOP: A 215	
Bottom: BLANK	
M-30	
Color: Blue FD&C Blue No. 2	
Size: 6.00 MM	
Shape: Round	
TOP: M	
Bottom: 30	

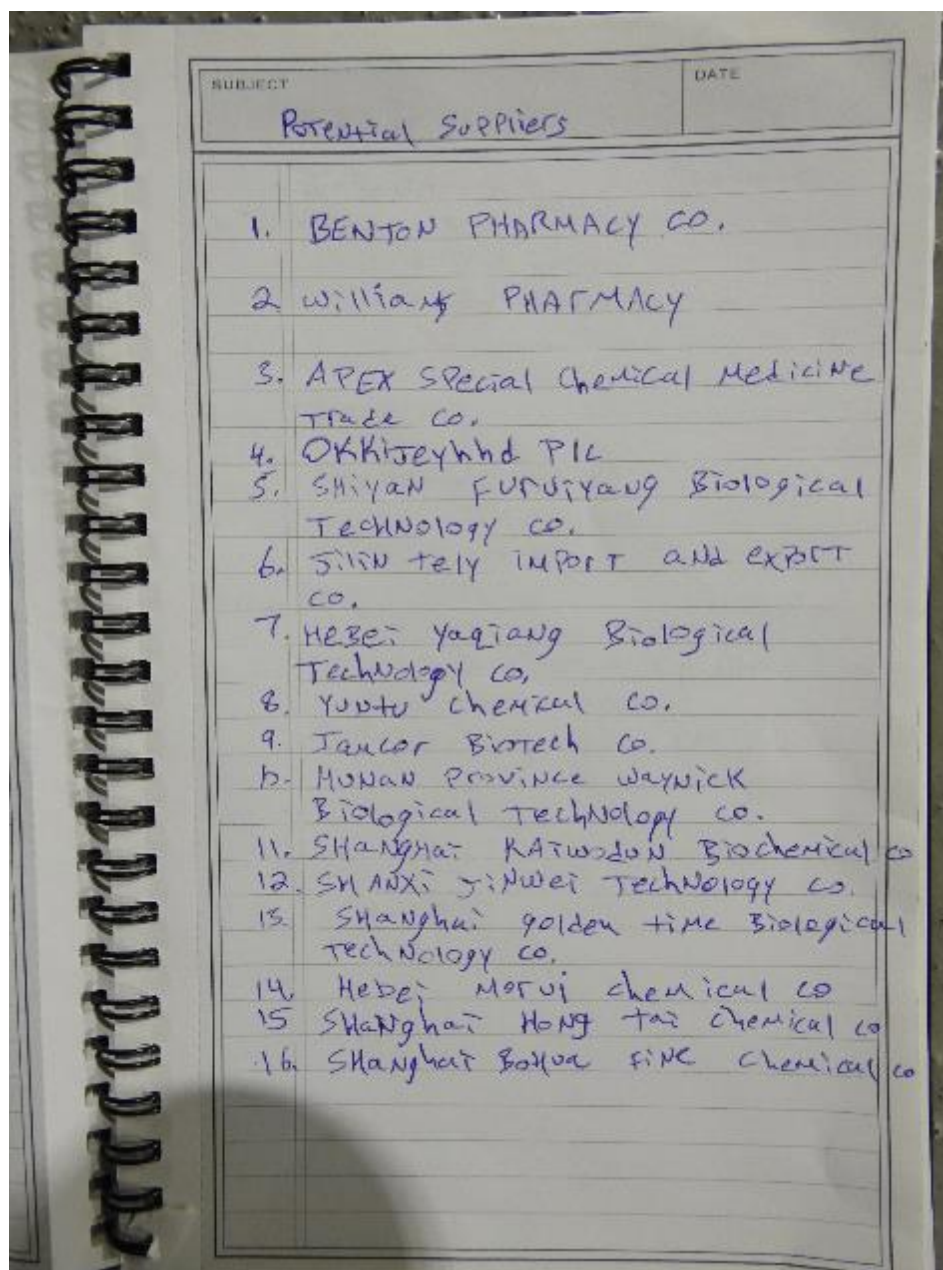
SUBJECT	DATE
V-48/12 30mg	
Color: Blue FD&C Blue No. 1	
Size: 6.00 MM	
Shape: Round	
TOP: V	
Bottom: 48/12	
E8 - 30mg	
Color: Blue FD&C Blue No. 1	
Size: 6.00 MM	
Shape: Round	
TOP: E/8	
Bottom: BLANK	
A-51 - 30mg	
Color: Blue	
Size: 6.00 MM	
Shape: Round	
TOP: A/51	
Bottom: BLANK	
RP 30 - 30mg	
Color: White	
Size: 6.00 MM	
Shape: Round	
TOP: R	
Bottom: 30	



23. Another page of the notebook listed a recipe for the creation of fake Adderall pills containing methamphetamine. At the top of the notebook page, the subject is listed as “Adderal” (sic). The page then lists the color as “orange” and the active ingredient as “meth.” The page lists a ratio of methamphetamine to utilize per pill: “0.02” grams being “good for 3 pills or 2 strong pills. You can meet in the middle at 1 gram for 25 pills.” On the same page there is a color mixture recipe stating the specific dyes and ratio of filler to dye: e.g., 100 grams of filler to .4 of the dye. The page also states that 45 grams of filler should be mixed with 1 gram of methamphetamine to generate a weight of 0.47 to .5 grams per pill (“45 g filler + 1 gram work weight 0.47 - 0.5 per unit”). An alternative recipe is also listed that states 45 grams of filler should be mixed with 2 grams of methamphetamine to generate a weight of 0.45 grams per pill (“45 g filler + 2 gram work weight 0.45 per unit”). The recipe also lists the dyes as “F D & C lake”. A photograph of this page follows:



24. Another page in the notebook listed the subject as “Potential Suppliers” and then contained sixteen chemical companies. Many of the entries appear to be Chinese based entities.



25. Another page in the notebook listed a contact of "Michael Sylvain" with an address of 6 Fountain Ave Apt #A for Lemelange.com. Investigators believe that "Michael Sylvain" is OPPENHEIMER's alias used in the purchase of and shipment of items utilized in the manufacturing process. Similarly, the Somerville, Massachusetts address has been used by OPPENHEIMER for the shipment of certain items as identified below in other materials obtained in this case. A photograph of the contact follows:

CONTACTS	
NAME	DETAILS
Michael Sylvain	Le Melange.com
6 FOUNTAIN AVE	
APT # A	

B. OPPENHEIMER CELLULAR PHONE

26. In the course of this investigation, investigators obtained search warrants for information and data derived from OPPENHEIMER's cellular phone. The data from OPPENHEIMER's cellular phone was determined to be associated with a phone number ending in 6009. The data derived from OPPENHEIMER's cellular phone contained chats, images, video, and other data indicative of his continued involvement in the manufacturing and distribution of controlled substances.

1. LEDGER

27. In the data derived from the cellular phone, investigators located a text message conversation taking place on May 16, 2022. In that conversation, investigators a message that contains a drug ledger listing the customers of OPPENHEIMER's drug manufacturing and distribution. That message follows:

Bag

- *Loso - 9*
- *L-Bang - 12*
- *Sin - 18.5*
- *Droop - 6*
- *Loco - 4*
- *Shizz - 5300*
- *Big Opp - 6.5*
- *Y.O - 2.5*
- *Fat Boy - 12.5*
- *Cheddar - 15*
- *Joe Black - 10*
- *Cass - 1*
- *Sol - 1200*
- *Tone - 9 K for blue (1200 for XNX)*
- *Rizz - 17K*

- Gi - 5

G Nipsey - @2 2K

Treve - 25K (I need to give him 3K new joints)

OG Mali - 3K

28. Next to the names are amounts which are believed to correlate to amounts of pills that have been provided in hundred pills quantities, and when thousands are denoted, the number is followed by a “K”. For example, an individual named “G Nipsey” is believed to have been provided 2000 pills (“2k”) at \$2 dollars per pill. The contact “Treve” is believed to have been provided 25,000 pills (“25K”) and that OPPENHEIMER needs to provide “Treve” with 3,000 (“3K”) replacement pills (“new joints”). The contact “Loso” is believed to have been provided 900 pills. By contrast, the contact “Tone” is believed to have been provided 9,000 blue pressed fentanyl pills (“9 K for blue”), and 1,200 pressed Xanax pills (“1200 for XNX”).

2. CONVERSATION WITH MARK CHENG

29. Through the course of this investigation, investigators also located a Whatsapp conversation between OPPENHEIMER using the 6009 phone number (and the name “S.K”) and an individual utilizing the name “Mark Cheng.” This individual, Mark Cheng, is believed to be This conversation took place between March 13, 2022, through July 2023:

Author	Content	Date / Time
16176946009 (S.K)	Hi Mark, I hope all is well! How has business been lately? The coronavirus had slowed my business for a while but it is starting to pick up again. I have a couple things I am looking for and I am hoping you are able to help. I am looking forward to hearing back from you soon!	3/13/2022 12:30:17 AM
8613866180910 (Mark Cheng)	Hi 😊	3/13/2022 1:16:26 AM
16176946009 (S.K)	Are you still working in the same business?	3/13/2022 1:17:32 AM
8613866180910 (Mark Cheng)	Yes what can I do for you	3/13/2022 1:17:59 AM
16176946009 (S.K)	I’m not sure if you remember me or not, my phone number changed recently but my name is Schuyler Oppenheimer. We were doing business right when Coronavirus started. The shipping name was Michael Sylvain.	3/13/2022 1:20:15 AM
16176946009	I have a few items I am looking for, can I send you over a	3/13/2022 1:20:15 AM

(S.K)	list to see if you are able to have any available?	
8613866180910 (Mark Cheng)	Yes it seemed that I sent you something	3/13/2022 1:20:27 AM
16176946009 (S.K)	Give me a minute to send over the list of the items I'm looking for	3/13/2022 1:23:05 AM
613866180910 (Mark Cheng)	Ok	3/13/2022 1:23:18 AM
16176946009 (S.K)	These are a few of the items I am looking for, if you can help me find them I would greatly appreciate it!	3/13/2022 1:45:29 AM
16176946009 (S.K)	1. Oxycodone Hydrochloride 2. Hydrocodone 3. Alprazolam 4. Amphetamine 5. Dextroamphetamine 6. Sildenafil 7. Levamisole 8. benzimidazole	3/13/2022 1:45:32 AM
8613866180910 (Mark Cheng)	Ok we sent you 1kg if sildenafil last time?	3/13/2022 1:52:25 AM
16176946009 (S.K)	Yes	3/13/2022 1:53:28 AM
8613866180910 (Mark Cheng)	How was it	3/13/2022 1:53:47 AM
16176946009 (S.K)	It was good, I used it to press some generic Sildenafil tablets	3/13/2022 1:54:29 AM
16176946009 (S.K)	👍👍	3/13/2022 1:54:33 AM
16176946009 (S.K)	I know we spoke about it before but are you still able to provide any tablet press machines, replacement parts for tablet machines, or tablet packaging machines?	3/13/2022 1:56:51 AM
8613866180910 (Mark Cheng)	Yes I sent you some for reference by email. Let me check tomorrow	3/13/2022 1:58:00 AM
16176946009 (S.K)	Which email did you send to?	3/13/2022 2:00:05 AM
8613866180910 (Mark Cheng)	Let me check	3/13/2022 2:10:35 AM
8613866180910 (Mark Cheng)	Anyway tomorrow I will send you details	3/13/2022 2:10:43 AM
8613866180910 (Mark Cheng)	How many kilos of each product do you need	3/13/2022 2:10:54 AM
16176946009 (S.K)	Sounds good, I am looking for these products as well. 9. Lactose Monohydrate 10. Stearin Acid 11. Microcrystalline cellulose 12. 4-AP 13. 4,4-PIPERIDINEDIOL 14. 1-BOC-4ANPP 15. 1-BOC-4-PIPERIDONE	3/13/2022 2:13:51 AM
16176946009 (S.K)	I will probably start with 1 kilo of each product since my business is only now starting to pick back up	3/13/2022 2:15:02 AM

16176946009 (S.K)	The most important products I am looking for are number (1, 3, 4, 12, 13, 14, and 15)	3/13/2022 2:17:06 AM
16176946009 (S.K)	I am able to get most of these products out here where I am but the problem is that the products are not pure.	3/13/2022 2:18:15 AM
8613866180910 (Mark Cheng)	Ok let me check out but I am not sure each product is available	3/13/2022 2:23:14 AM
16176946009 (S.K)	Sounds good, let me know which products you have available and the price per kilo when you have a chance	3/13/2022 2:26:21 AM
16176946009 (S.K)	It was nice talking to you again Mark! Thanks again for your help on this, and I am looking forward to your reply	3/13/2022 2:27:14 AM
8613866180910 (Mark Cheng)	It's great talking with you too. Good night	3/13/2022 2:33:57 AM
16176946009 (S.K)	Good night my friend	3/13/2022 2:51:47 AM
8613866180910 (Mark Cheng)	4-AP is 4-Aminopyridine?	3/15/2022 8:39:41 AM
16176946009 (S.K)	Hey I apologize for the delay, I believe 4-ap is 4-anilinopiperidine	3/24/2022 9:08:48 PM
16176946009 (S.K)	I am still waiting on confirmation from my partners	3/24/2022 9:08:56 PM
16176946009 (S.K)	It might be 4-Aminopyridine, can you check on both of those for me to see what's available?	3/24/2022 9:10:52 PM
16176946009 (S.K)	I am able to purchase most of these in Mexico but the trouble is they are much more expensive than I would like.	3/24/2022 9:11:51 PM
16176946009 (S.K)	Did you have any luck on any of the other products?	3/25/2022 11:02:33 PM
8613866180910 (Mark Cheng)	Let me check. How many kilos do you need for each	3/26/2022 12:31:07 AM
16176946009 (S.K)	It depends on which products are available	3/26/2022 12:32:21 AM
16176946009 (S.K)	Once I know which products are available and what the price is per kilo I will let you know	3/26/2022 12:33:06 AM
8613866180910 (Mark Cheng)	Ok I will send you	3/26/2022 12:45:45 AM
16176946009 (S.K)	Thank you	3/26/2022 12:48:26 AM
8613866180910 (Mark Cheng)	6,8,11 available	3/28/2022 9:45:01 AM
16176946009 (S.K)	Hey Mark, I hope all well. Are are you still in business? I was hoping to place a order for some machinery parts	7/17/2023 8:02:40 PM
8613866180910 (Mark Cheng)	Hi what can I do for you	7/18/2023 10:15:59 AM
16176946009 (SK)	I looking to purchase a new tablet press machine, and also wanted to purchase some new dies for one of the machines I currently have in use	7/18/2023 3:11:50 PM
16176946009 (SK)	Let me know if this is possible and I can send you over the models of the press machines	7/18/2023 3:12:36.268 PM

30. Investigators believe that in this conversation OPPENHEIMER is communicating with a large-scale supplier of illicit chemicals and controlled substances based in China. OPPENHEIMER reintroduces himself by name and their past business dealings. OPPENHEIMER notes that he employed a shipping name of “Michael Sylvain.” Then OPPENHEIMER asks if Cheng has certain controlled substances he lists out. The list includes controlled substances, such as Oxycodone Hydrochloride (utilized in Percocet and Oxycodone pills), Hydrocodone, Alprazolam (used in Xanax pills), and Amphetamine. Cheng asks if they had previously sent OPPENHEIMER a kilogram of sildenafil, and he acknowledges that Cheng is correct. OPPENHEIMER then states that he used the sildenafil and pressed it into tablet form (“used it to press some generic Sildenafil tablets”). OPPENHEIMER then asks Cheng if he can provide tablet press machines, replacement parts for tablet machines, and tablet packaging machines (“are you still able to provide any tablet press machines, replacement parts for tablet machines, or tablet packaging machines”). Cheng agrees that he can and indicates that he sent OPPENHEIMER an email concerning the machines. Cheng then asks how many kilos of each product OPPENHEIMER wants (“How many kilos of each product do you need”). OPPENHEIMER then asks for another list of items, which includes materials used in the creation of pressed pills, such as lactose monohydrate, stearin acid, and microcrystalline cellulose. OPPENHEIMER also asks for items which have been identified as precursor chemicals used in the synthesis of fentanyl, such as 4-AP,² 4,4-PIPERIDINEDIOL,³ 1-BOC-4ANPP,⁴ and 1-BOC-4-PIPERIDONE. OPPENHEIMER asks for one kilogram of each product since his business is beginning to pick up (“I will probably start with 1 kilo of each product since my business is only now starting to pick back up”). OPPENHEIMER then emphasizes that the Oxycodone Hydrochloride, Alprazolam,

² OPPENHEIMER later clarifies that 4-AP, refers to 4-anilinopiperidine or 4-Aminopyridine, which are precursor chemicals used in the synthesis of fentanyl (“I apologize for the delay, I believe 4-ap is 4-anilinopiperidine” “It might be 4-Aminopyridine”). Of note, OPPENHEIMER indicates he is waiting for confirmation as to the identity of the substance from his “partners” (“I am still waiting on confirmation from my partners”).

³ See <https://www.federalregister.gov/documents/2022/09/22/2022-19974/designation-of-4-piperidone-as-a-list-i-chemical>

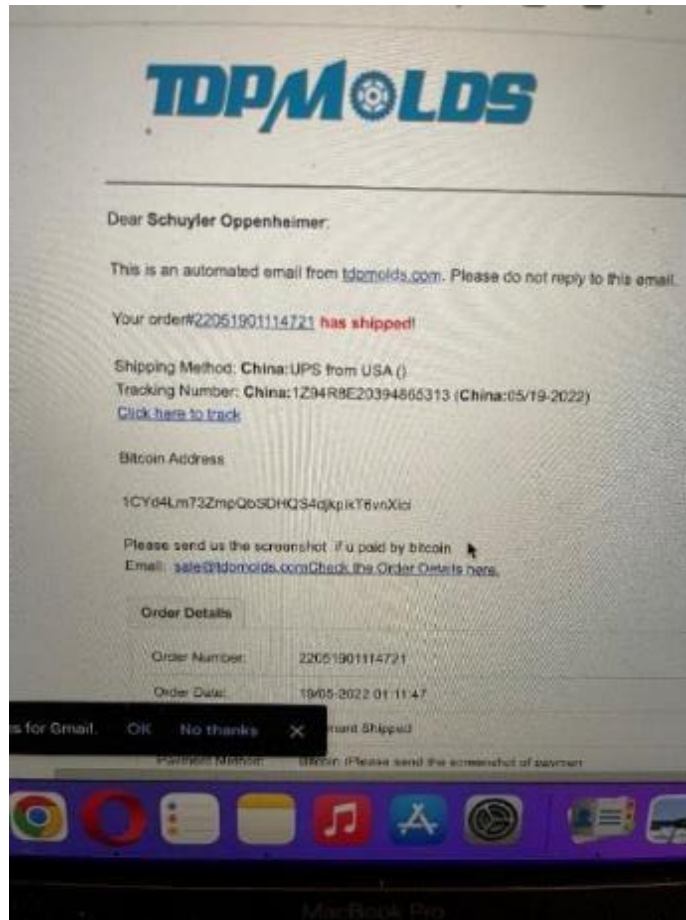
⁴ See <https://www.federalregister.gov/documents/2010/06/29/2010-15520/control-of-immediate-precursor-used-in-the-illicit-manufacture-of-fentanyl-as-a-schedule-ii>

Amphetamine, and the fentanyl precursors are the most important products (“The most important products I am looking for are number (1, 3, 4, 12, 13, 14, and 15)”). OPPENHEIMER also notes that he has been able to get most of the products but that the chemicals and controlled substances he obtained were not pure (“I am able to get most of these products out here where I am but the problem is that the products are not pure.”). OPPENHEIMER then states that he can source these products from Mexico but the prices are much higher than he would like (“I am able to purchase most of these in Mexico but the trouble is they are much more expensive than I would like.”).

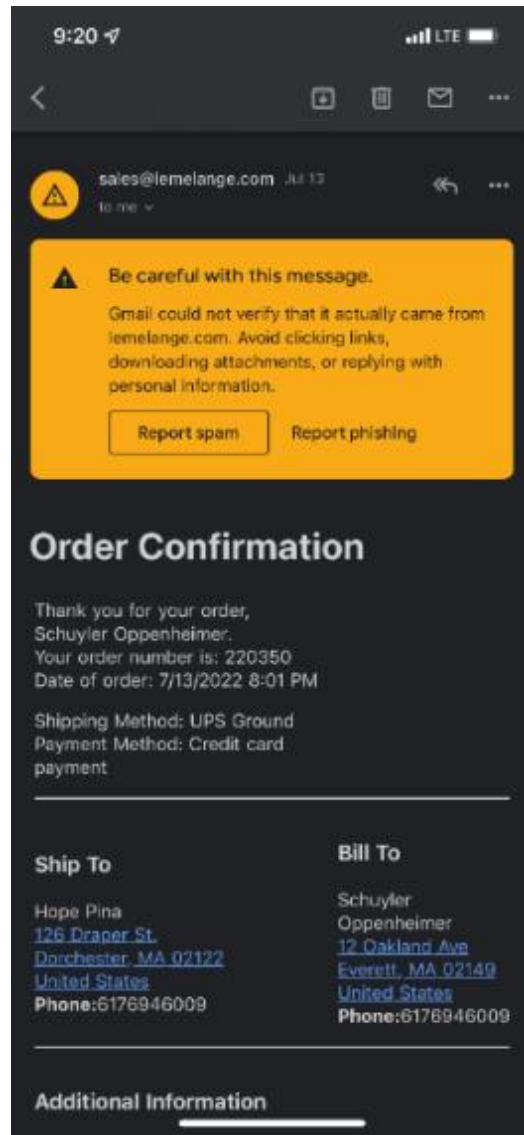
31. Then, in July 2023, OPPENHEIMER reinitiated conversation with Mark Cheng and inquires about the purchase of a pill press machine. OPPENHEIMER also notes that he is in possession of a pill press machine that he is currently using and is looking to purchase new “dies”, which are the molds used to form the pills and imprint markings on them (“I looking to purchase a new tablet press machine, and also wanted to purchase some new dies for one of the machines I currently have in use”).

3. PHOTOGRAPHS AND VIDEOS

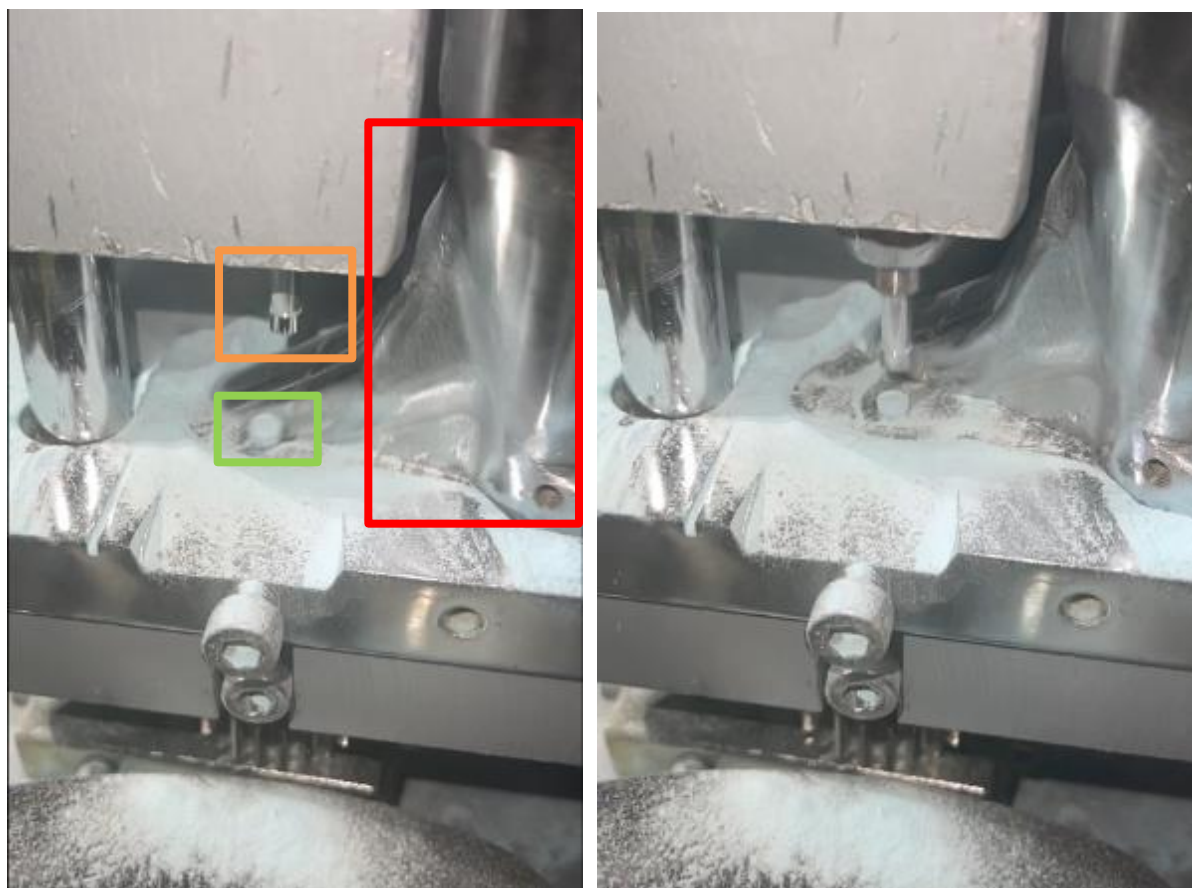
32. In the data, investigators located a photograph of a computer screen depicting an order confirmation email from TDPMOLDS.com. The metadata for the photograph suggests it was taken on May 19, 2022. In the photograph, a computer screen displays an email address to Schuyler OPPENHEIMER from TDPMOLDS indicating that an order dated May 19, 2022, has shipped. I believe that this is a photograph of a computer screen as various applications can be observed on the bottom of the screen. The email lists an order number of 22051901114721 and a tracking number. The photograph follows:



33. Investigators located a screen capture of an order confirmation from lemeland.com. The metadata for the screen data indicates it was taken on July 20, 2022. The order confirmation is addressed to Schuyler OPPENHEIMER and indicates that an order was placed on July 13, 2022, at 8:01 PM and that it is shipping by UPS Ground. The billing address is Schuyler Oppenheimer at 12 Oakland Avenue, Everett, Massachusetts. Both the shipping address and billing address list the phone number ending in 6009.



34. Investigators also located a video file named “IMG_6493.mov”, the metadata, filename, and location of the file within the iCloud directory structure suggest that the video was taken by the device associated with OPPENHEIMER’s iCloud. The metadata suggests that the video was created on or about July 21, 2022. This 3-second video depicts a TDP style pill press in operation. This make and model pill press is consistent with the TDPMolds.com purchase described above (the screen capture of the order above), and below (in the email account data from the Michaelsylvain89@gmail.com email address). Still images from video follows:



35. In the still images from the video IMG_6493.mov video, a formed round blue pill can be observed (outlined in green). The die mold (outlined in orange) can be observed above extending into the press where the pill is formed with the desired imprint. The metal item to the right (outlined in red), then pivots in order to kick the formed pill off the platform. The machine then adds additional powder and another pill is formed. The color appears to be consistent with that used in blue pressed fentanyl pills designed to imitate Percocet 30mg pills with the M30 imprint.

36. Investigators also located hundreds of images of pill press machines, parts, and dyes used to press counterfeit pharmaceutical pills. These images appear to have been downloaded from websites selling the various items. For such images, the metadata shows the date in which the image was downloaded to the device from the internet. Some example images follow, bearing metadata indicating creation/modification dates from May 2024. which is the same month that the phone was seized.

Date /Time	Name / Description	
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5/21/2024 2:01:05 PM (UTC-4)	546c75bfcc732a8ea517d4860e896409.jpg Pill Press Boot	
5/19/2024 11:23:00 PM (UTC-4)	88ae880788d90fd0a4ef6183208ffaf7.jpg Desktop Tablet Press	
5/18/2024 11:44:36 PM (UTC-4)	9d417cd88543a127421f48a2f912a0bb.jpg Powder Mixing Machine	

5/19/2024 11:23:00 PM (UTC-4)	b852b65b705e5ac7ea473cac4275bce7.jpg Rotary Tablet Press	
5/19/2024 10:43:02 AM (UTC-4)	c0f61758849bb0082cb2c2052fb40782.jpg M30 Molds	
5/21/2024 2:01:09 PM (UTC-4)	f8a26b081d2d2a9e7e924c2dfd2ed312.jpg Desktop Tablet Press	

4. WEB HISTORY

37. Investigators located extensive web browsing history demonstrating that OPPENHEIMER continues to source and seek out pill presses, pill press dyes, parts, and materials used in the manufacturing process. This includes numerous searches for desktop tablet/pill presses (TDP), dyes, molds, “M30” molds

to manufacture counterfeit Oxycontin 30mg pills, and other items. This also included websites known to sell pill presses and parts, such as [besttabletpress.com](https://www.besttabletpress.com), [tabletpressdies.com](https://www.tabletpressdies.com), and [tdptabletpress.com](https://www.tdptabletpress.com).

Examples follow:

Title	URL	Last Visited-Time
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/21/2024 2:05:36 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/21/2024 2:05:35 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/21/2024 12:01:55 AM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/21/2024 12:01:53 AM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/20/2024 12:06:09 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:04:20 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:04:20 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:04:20 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:04:20 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:04:18 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:04:18 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:04:18 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:04:18 PM (UTC-4)
"M" - Best Tablet Press	https://www.besttabletpress.com/?s=M&post_type=product	5/19/2024 8:03:36 PM (UTC-4)
"M" - Best Tablet Press	https://www.besttabletpress.com/?s=M&post_type=product	5/19/2024 8:03:35 PM (UTC-4)
"M" - Best Tablet Press	https://www.besttabletpress.com/?s=M&post_type=product	5/19/2024 8:03:34 PM (UTC-4)
"M" - Best Tablet Press	https://www.besttabletpress.com/?s=M&post_type=product	5/19/2024 8:03:32 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:03:32 PM (UTC-4)
"M" - Best	https://www.besttabletpress.com/?s=M&post_type=product	5/19/2024 8:03:30 PM (UTC-4)

Tablet Press	ct	
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:03:24 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:03:23 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:03:23 PM (UTC-4)
"M 30" - Best Tablet Press	https://www.besttabletpress.com/?s=M+30&post_type=product&dgwt_wcas=1	5/19/2024 8:03:22 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:02:59 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:02:58 PM (UTC-4)
	https://www.besttabletpress.com/wpcontent/plugins/woocommerce/assets/js/frontend/addtocart.min.js?ver=8.9.0	5/19/2024 8:02:58 PM (UTC-4)
404 - Page not found - Best Tablet Press	https://www.besttabletpress.com/product/m30-tablet-press-die-mold-set-for-tdp-0-1-5-5-6-support-custom/	5/19/2024 8:02:57 PM (UTC-4)
	https://www.besttabletpress.com/product/m30tabletpressdie-moldsetfortdp01556supportcustom/	5/19/2024 8:02:57 PM (UTC-4)
TDP - 1.5 Press Die Machine - tablet press - New Dawn	https://tabletpressdies.com/tablet-press/tdp-1-5-press-die-machine	5/19/2024 8:02:49 PM (UTC-4)
TDP - 1.5 Press Die Machine - tablet press - New Dawn	https://tabletpressdies.com/tablet-press/tdp-1-5-press-die-machine	5/19/2024 8:02:48 PM (UTC-4)
TDP - 1.5 Press Die Machine - tablet press - New Dawn	https://tabletpressdies.com/tablet-press/tdp-1-5-press-die-machine	5/19/2024 8:02:48 PM (UTC-4)
	https://tabletpressdies.com/skin/frontend/sns_kalolia/default/sns/twitter/js/twitterfetchermin.js	5/19/2024 8:02:47 PM (UTC-4)
tdp 1.5 die - Brave Search	https://search.brave.com/search?q=tdp%201.5%20die&source=ios	5/19/2024 8:02:38 PM (UTC-4)
tdp 1.5 die - Brave Search	https://search.brave.com/search?q=tdp%201.5%20die&source=ios	5/19/2024 8:02:37 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/16/2024 12:22:46 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/16/2024 12:22:40 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/15/2024 4:43:52 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/15/2024 4:43:48 PM (UTC-4)

Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/15/2024 12:59:55 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/15/2024 12:59:53 PM (UTC-4)
Tablet excipients Archives TDP Tablet Presses	https://tdptabletpresses.com/product-category/tablet-excipients/	5/13/2024 4:43:28 PM (UTC-4)
Tablet excipients Archives TDP Tablet Presses	https://tdptabletpresses.com/product-category/tablet-excipients/	5/13/2024 4:43:27 PM (UTC-4)
Tablet excipients Archives TDP Tablet Presses	https://tdptabletpresses.com/product-category/tablet-excipients/	5/13/2024 4:43:27 PM (UTC-4)
	https://tdptabletpresses.com/productcategory/tabletexci pents/	5/13/2024 4:43:25 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/13/2024 4:43:18 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/13/2024 4:43:17 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/13/2024 4:43:17 PM (UTC-4)
	https://www.besttabletpress.com/tabletpressmolds/	5/13/2024 4:43:17 PM (UTC-4)
Tablet Press Molds – Best Tablet Press	https://www.besttabletpress.com/tablet-press-molds/	5/13/2024 4:43:08 PM (UTC-4)
Tablet excipients Archives TDP Tablet Presses	https://tdptabletpresses.com/product-category/tablet-excipients/	5/13/2024 4:42:41 PM (UTC-4)
Blister Packers Blister Packing Machines TDP Tablet Presses	https://tdptabletpresses.com/product-category/blister-packers/	5/13/2024 4:42:37 PM (UTC-4)
Blister Packers Blister Packing Machines TDP Tablet Presses	https://tdptabletpresses.com/product-category/blister-packers/	5/13/2024 4:42:37 PM (UTC-4)
Blister Packers Blister Packing Machines TDP Tablet Presses	https://tdptabletpresses.com/product-category/blister-packers/	5/13/2024 4:42:36 PM (UTC-4)

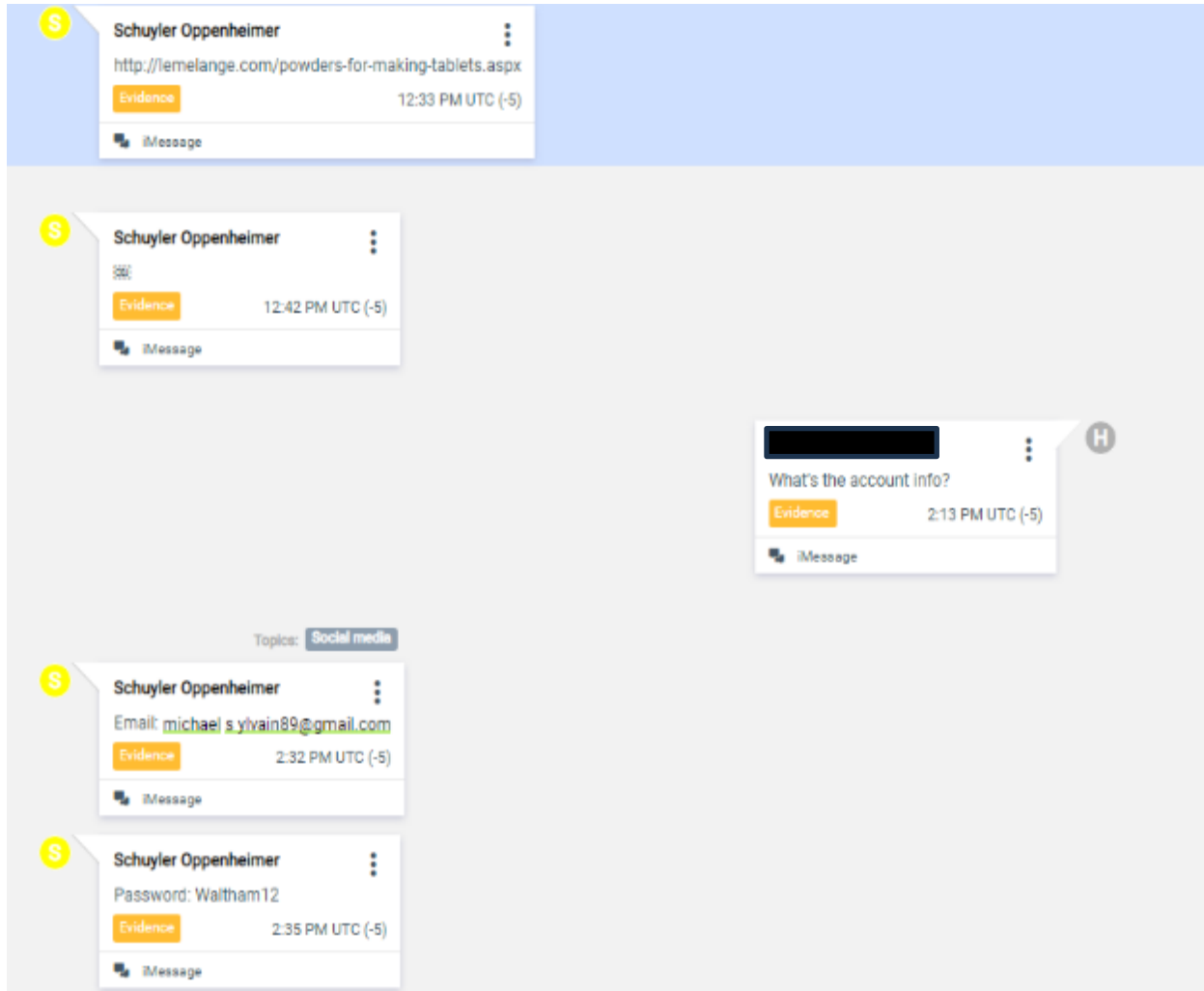
	https://tdptabletpresses.com/productcategory/blisterpackers/	5/13/2024 4:42:35 PM (UTC-4)
Blister Packers Blister Packing Machines TDP Tablet Presses	https://tdptabletpresses.com/product-category/blister-packers/	5/13/2024 4:42:30 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/?orderby=popularity	5/13/2024 4:42:17 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/?orderby=popularity	5/13/2024 4:42:17 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/?orderby=popularity	5/13/2024 4:42:17 PM (UTC-4)
	https://www.tdpdies.com/productcategory/tdp0tdp15/?orderby=popularity	5/13/2024 4:42:17 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/?orderby=popularity	5/13/2024 4:42:15 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/?orderby=popularity&paged=1	5/13/2024 4:42:14 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/	5/13/2024 4:41:53 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/	5/13/2024 4:41:53 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/	5/13/2024 4:41:53 PM (UTC-4)
TDP 0 & TDP 1.5 Pill Press Stamps • TDP0 Tablet Press Punch Dies	https://www.tdpdies.com/product-category/tdp-0-tdp-1-5/	5/13/2024 4:41:52 PM (UTC-4)

	https://www.tdpdies.com/productcategory/tdp0tdp15/	5/13/2024 4:41:52 PM (UTC-4)
There has been an error processing your request	https://tabletpressdies.com/m30-pill-press-dies-for-tdp-1-5-press-die-machine	5/13/2024 4:41:36 PM (UTC-4)
There has been an error processing your request	https://tabletpressdies.com/m30-pill-press-dies-for-tdp-1-5-press-die-machine	5/13/2024 4:41:36 PM (UTC-4)
TDP DIES Punch Die Moulds & Tablet Stamps for TDP & RTP Pill Press	https://www.tdpdies.com/	5/13/2024 4:41:35 PM (UTC-4)
TDP DIES Punch Die Moulds & Tablet Stamps for TDP & RTP Pill Press	https://www.tdpdies.com/	5/13/2024 4:41:27 PM (UTC-4)
TDP - 1.5 Press Die Machine - tablet press - New Dawn	https://tabletpressdies.com/tablet-press/tdp-1-5-press-die-machine	5/13/2024 4:41:23 PM (UTC-4)
TDP - 1.5 Press Die Machine - tablet press - New Dawn	https://tabletpressdies.com/tablet-press/tdp-1-5-press-die-machine	5/13/2024 4:41:22 PM (UTC-4)
TDP-1.5 Desktop TDP Tablet Press Single Pill Press TDP Tablet Presses	https://tdptabletpresses.com/shop/tdp-1-5-tablet-press/	5/13/2024 4:40:54 PM (UTC-4)
	https://m.stripe.network/inner.html	5/13/2024 4:40:54 PM (UTC-4)
TDP-1.5 Desktop TDP Tablet Press Single Pill Press TDP Tablet Presses	https://tdptabletpresses.com/shop/tdp-1-5-tablet-press/	5/13/2024 4:40:53 PM (UTC-4)
TDP 1.5 Desktop Tablet Press – Automatic Single Punch Tablet Press Machine – Best Tablet Press	https://www.besttabletpress.com/product/tdp-1-5-desktop-tablet-press-automatic-single-punch-tablet-press-machine/	5/13/2024 4:40:45 PM (UTC-4)
TDP 1.5 Desktop Tablet Press –	https://www.besttabletpress.com/product/tdp-1-5-desktop-tablet-press-automatic-single-punch-tablet-press-machine/	5/13/2024 4:40:42 PM (UTC-4)

Automatic Single Punch Tablet Press Machine – Best Tablet Press		
tdp 1.5 die - Brave Search	https://search.brave.com/search?q=tdp%201.5%20die&source=ios	5/13/2024 4:40:30 PM (UTC-4)
tdp 1.5 die - Brave Search	https://search.brave.com/search?q=tdp%201.5%20die&source=ios	5/13/2024 4:40:28 PM (UTC-4)
	https://lemelange.com/error.html?aspxerrorpath=/login.aspx	4/14/2024 8:25:53 AM (UTC-4)
	https://lemelange.com/cart.aspx?error=The+payment+was+declined.++Please+check+your+credit+card+information+to+make+sure+it+was+entered+correctly.	4/14/2024 12:16:30 AM (UTC-4)
	https://lemelange.com/error.html?aspxerrorpath=/checkout.aspx	4/12/2024 5:13:44 PM (UTC-4)
	https://lemelange.com/cart.aspx	4/11/2024 5:14:08 PM (UTC-4)
	https://lemelange.com/tabletingpowders.aspx	4/11/2024 5:07:21 PM (UTC-4)
	https://lemelange.com/scripts/addthis.js	4/11/2024 5:05:16 PM (UTC-4)
	https://lemelange.com/scripts/jquery.producthistory.js	4/11/2024 5:03:55 PM (UTC-4)
	https://lemelange.com/	4/11/2024 5:03:54 PM (UTC-4)
	https://search.brave.com/search?q=le%20melange%20llc&source=ios	4/11/2024 5:03:47 PM (UTC-4)
	https://search.brave.com/search?q=tdp%200&source=ios	3/15/2024 10:40:22 AM (UTC-4)
	https://tdptabletpresses.com/productcategory/tabletpresses/	3/15/2024 10:40:13 AM (UTC-4)
	https://tdptabletpresses.com/productcategory/powdermixers/	3/15/2024 10:37:16 AM (UTC-4)
	https://js.stripe.com/v3/controller2a60c5a9f22c11338921f19168132a95.html	3/15/2024 10:37:07 AM (UTC-4)
	https://tdptabletpresses.com/shop/cfq300tabletdeduster/	3/15/2024 10:37:06 AM (UTC-4)
	https://tdptabletpresses.com/shop/tdpdesktoptabletpressrange/	3/15/2024 10:36:36 AM (UTC-4)
	https://tdptabletpresses.com/productcategory/singlepunchtabletpress/	3/15/2024 10:36:26 AM (UTC-4)
	https://ei.phncdn.com/wwwstatic/js/lib/phfunctions.js?cache=2023112905	12/1/2023 1:56:47 PM(UTC-5)
	https://search.brave.com/search?q=pornhub&source=ios	12/1/2023 1:56:43 PM(UTC-5)
	https://cdn.banhq.com/html/9/a/9a68c39b813e7c7d5e70018dcfbf5d21.html	12/1/2023 11:39:33 AM(UTC-5)
	https://search.brave.com/search?q=can%20you%20overdose%20on%20cocaine&source=ios	11/16/2023 12:13:25 AM(UTC-5)
	https://lemelange.com/error.html?aspxerrorpath=/sendpas sword.aspx	11/15/2023 11:28:20 PM(UTC-5)

38. In the data derived from the cellular phone, investigators also located a text message conversation taking place on or about January 9, 2021, between OPPENHEIMER and a female associate who is known to be OPPENHEIMER's former girlfriend. In that conversation, OPPENHEIMER sends a link to the Lemelange.com website, specifically to a webpage reflecting powders for making tablets. The

associate responds asking for the “account info”, presumably in order to purchase the items listed on that website. OPPENHEIMER responds with the “michael s ylvain89@gmail.com” (sic). In this text message conversation, the email address contains additional spaces that appear to be the result of typographical errors. This conversation located in the data of the TARGET APPLE ACCOUNT follows:



C. MICHAELSYLVAIN89@GMAIL.COM

39. Investigators reviewed the content of the michaelsylvain89@gmail.com email address through a search warrant that was served upon Google. This email address was identified as an email address utilized by OPPENHEIMER. In the emails sent and received by the michaelsylvain89@gmail.com account, investigators located a large number of orders from TDPMolds.com, TDK Trading, and Le Melange relating to the purchase of materials used in the production of pressed fentanyl pills. Investigators

also located emails to and from eBay vendors who sold OPPENHEIMER Glock firearm parts and accessories.

1. TDPMOLDS.COM

40. TDPMolds.com is an online retailer selling molds and pill presses. Through review of emails from emails from sales@TDPMolds.com, investigators identified the following orders of pill press related parts and items. This particular email address and TDPmolds.com were subject to sanctions instituted by the U.S. Treasury Department as a result of their selling pill press machines and dies.⁵ The press release stated the following concerning the TDPmolds sanctions:

Lastly, OFAC designated online business Tdpmolds, an entity established and controlled by Zhao Dongdong (赵冬冬) (Zhao), a Chinese national located in Yantai, China. In addition to Tdpmolds, OFAC designated Chinese nationals and entities Zhao, Pan Hao (潘昊) (Pan), Yantai Yixun International Trade Co., Ltd. (烟台易迅国际贸易有限公司) (Yantai Yixun), and Yantai Mei Xun Trade Co., Ltd. (烟台美讯商贸有限公司) (Yantai Mei Xun).

Tdpmolds offers a range of pill press machines and dies for sale, and as recently as 2020, Tdpmolds shipped to the United States several pill press die molds, including ones used to produce counterfeit schedule II oxycodone and amphetamine pill products. As of 2019, “Xanax” dies used in support of U.S.-based pill press operations and sourced from Tdpmolds were seized by U.S. authorities. In that same year, Tdpmolds was also the source of other dies, including a counterfeit “M30” die, also used in U.S.-based criminal pill press operations. In 2019 and 2020, Zhao sold pill presses and die sets to individuals in the United States who used the equipment to produce pills with scheduled substances, including counterfeit pills marked with “M30” and “Xanax.” In 2019 and 2020, Pan facilitated the sale from Tdpmolds to the United States of dies used to manufacture counterfeit pills. As of 2019, Yantai Yixun was the source of equipment used by a U.S.-based drug trafficker involved with an illicit pill manufacturing business using dies to counterfeit scheduled drugs.

41. Among the purchases made from TDPMolds.com were numerous molds (“dies”) for counterfeit pills. The molds are identified by the specific imprint they bear, such as M30 designed to imitate Percocet 30mg, and RP30 designed to imitate oxycodone hydrochloride. Some orders include parts for “rotary” style tablet presses that produce multiple pills simultaneously and can cost upwards of \$20,000.

⁵ <https://home.treasury.gov/news/press-releases/jy1507>

For rotary style presses, multiple molds are required and the costs for the molds reflect the multiple molds.

The items list the TDP model that they are useable for, including TDP0, TDP 1.5, and TDP 5.

42. The information listed below is reproduced from the emails received by OPPENHEIMER at the michaelsylvain89@gmail.com address from sales@tdpmolds.com. Specifically, the following orders and purchases were identified to have been made by OPPENHEIMER, either in his own name, the alias Michael Sylvain that is known utilized by OPPENHEIMER, or in the name of female associates of OPPENHEIMER, such as AD, HP, and JR. Addresses have been reduced to city and state, and phone numbers to the last four digits.

Date / Order #	Shipping Address	Billing Address	Purchased Items	Total Cost for Order
1/7/2020 20010713212778	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	E712/10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 M099 Size: TDP-0/1.5 M30 6mm ZP Rotary Tablet Press Die Mold Custom Die for ZP Rotary Tablet Press Machine Mill Press Machine M30 6mm ZP Size: 9 sets RP 30 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA RP 30 Size: TDP-0/1.5 RP 10 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA RP 10 Size: TDP-0/1.5	\$925.99
1/8/2020 19123106015826	Michael Sylvain (Somerville, 02145 - Massachusetts,	Michael Sylvain (Somerville, 02145 - Massachusetts,	M523 10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP	\$1,524.99

	United States) Phone: 6457	United States) Phone: 6457	<p>Punch Die TDP0/1.5/5 SHIP FROM USA M523 10325 Size: TDP-0/1.5</p> <p>M30 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M30 Size: TDP-0/1.5</p> <p>Electric TDP-1.5 Single punch tablet press machine TDP-1.5 pill press machine / pill making / TABLET PRESSING, pill making yp003</p> <p>E8 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M083</p>	
1/28/2020 20012814553343	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	<p>Percocet 10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA Percocet 10325 Size: TDP-0/1.5</p>	\$90.50
2/6/2020 20020615090344	Melissa Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 7800	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	<p>RP 30 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M051 Size: TDP-0/1.5</p> <p>Percocet 10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M039 Size: TDP-0/1.5</p> <p>K9 6mm Tablet Press Die Tablet Press Molds TDP</p>	\$261.99

			Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M037 Size: TDP-0/1.5	
1/7/2020 20010713283162	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	M30 6mm ZP Rotary Tablet Press Die Mold Custom Die for ZP Rotary Tablet Press Machine Mill Press Machine M30 6mm ZP Size: 9 sets	\$658.99
1/28/2020 20012814475296	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Percocet 10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA Percocet 10325 Size: TDP-0/1.5 A215 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA A215 Size: TDP-0/1.5 K9 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA K9 Size: TDP-0/1.5	\$250.99
2/10/2020 20021105471174	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 8359	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	K9 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M037 Size: TDP-0/1.5 RP 10325 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M023 Size: TDP-0/1.5	\$250.99

			K56 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M069 Size: TDP-0/1.5	
2/10/2020 20021105514280	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	K9 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M037 Size: TDP-0/1.5 K56 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M069 Size: TDP-0/1.5	\$160.99
2/28/2020 20022902271941	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	M30 6.5mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA H015 Size: TDP-0/1.5	\$90.50
2/28/2020 20022902310884	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 6457	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 6457	RP 30 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M051 Size: TDP-0/1.5	\$90.50
2/28/2020 20022902375814	Schuyler Oppenheimer (Somerville, 02143 - Massachusetts, United States) Phone: 6457	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	4812 V 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5/6 send from California M047 Size: TDP-0/1.5 RP 10 10mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M087	\$250.99

			Size: TDP-0/1.5 A215 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M017 Size: TDP-0/1.5	
1/31/2021 19123106015826	Michael Sylvain (Somerville, 02145 - Massachusetts, United States) Phone: 6457	Michael Sylvain Somerville, 02145 - Massachusetts, United States) Phone: 6457	M523 10325 Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M071 Size: TDP-0/1.5 M30 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M015 Size: TDP-0/1.5 Electric TDP-1.5 Single punch tablet press machine TDP-1.5 pill press machine / pill making / TABLET PRESSING, pill making yp003 E8 6mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA M083	\$1,524.99
3/9/2021 21031000172493	[HP] (Dorchester, 02122 - Massachusetts, United States) Phone: 9624	[AD] (Everett, 02149-2901 - Massachusetts, United States) Phone: 4259	Electric TDP-1.5 Single punch tablet press machine TDP-1.5 pill press machine / pill making / TABLET PRESSING, pill making yp003 M30 6.5mm Tablet Press Die Tablet Press Molds TDP Dies Molds Stamp TDP Punch Die TDP0/1.5/5 SHIP FROM USA H015	\$1,644.99

			<p>Size: TDP-0/1.5</p> <p>Bucket Feeder for tablet press machine TDP0/1.5/5/6 Bucket Size: TDP-0/1.5</p> <p>Screw for Bucket Feeder for tablet press machine TDP0/1.5/5/6 USA Screw Size: TDP-0/1.5</p>	
4/12/2021 21041306240376	[HP] (Dorchester, 02122 - Massachusetts, United States) Phone: 9624	[AD] (Everett, 02149-2901 - Massachusetts, United States) Phone: 4259	<p>Bucket Feeder for tablet press machine TDP0/1.5/5/6 Bucket Size: TDP-0/1.5</p>	\$160.99
5/18/2022 22051901114721	Schuyler Oppenheimer (12 Oakland Ave, Everett, 02149 - Massachusetts, United States) Phone: 6595	[AD] Everett, 02149-2901 - Massachusetts, United States Phone: 4259	Upper Drift Pin Assembly for the TDP5 machine, send from china , could only install on our machine PJ006	\$90.50
7/15/2022 22071505474175	[HP] (Dorchester, 02122 - Massachusetts, United States) Phone: 9624	[AD] (Everett, 02149-2901 - Massachusetts, United States) Phone: 4259	<p>M 30 6.5mm TDP Dies Molds Stamp TDP Punch Machine Die TDP-0/1.5/5 H015 Size: TDP-5</p> <p>AD 30 10mm TDP Dies Molds Stamp TDP Punch Machine Die TDP-0/1.5/5 M025 Size: TDP-5</p> <p>Lower Drift Pin Assembly - for the TDP machine, send from china , could only install on our machine PJ009 Size: TDP-0/1.5</p> <p>Upper Drift Pin Assembly for the TDPmachine, send from china , could only install on our machine PJ006 Size: TDP-5</p> <p>Upper Drift Pin Assembly Rod Eye and Clevis For the</p>	\$436

			tablet press machine PJ004 Size: TDP-5	
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2. TKBTrading.com

43. Investigators also located a series of emails from support@tkbtrading.com to the michaelsylvain89@gmail.com account that appeared to reflect purchases of materials that can be utilized in the manufacture of counterfeit pills.

Date / Order #	Shipping Address	Contact Information	Purchased Items	Total Cost for Order
1/6/2020 / 214682	Michael Sylvain Somerville, MA 02145 United States Phone: 4259	Schuyler Oppenheimer Somerville, MA 02143 United States Phone: 6457 michaelsylvain89@gmail.com	D&C Yellow 10 Alum Lake 4oz (113g) LI-303-4oz x 3	\$18.95
2/26/2020 / 244492	Michael Sylvain Somerville, MA 02145 United States Phone: 8359	[AD] Everett, MA 02149 United States Phone: 8359 michaelsylvain89@gmail.com	FD&C Blue 1 Batch Certified LG-104-1LB D&C Red 27 Alum Lake 4oz (113g) LI-204-4oz FD&C Yellow 6 Lake 4oz (113g) LI-302-4oz	\$106.95

3. Firearm Related Purchases

44. Investigators also located a series of emails from eBay.com reflecting purchases made by the michaelsylvain89@gmail.com account of parts and accessories for Glock firearms. Specifically, investigators located a VISM tool kit for Glock firearms, and upper and lower parts for a Glock 26 firearm. Investigators know that Polymer80 manufactures 80% completed lowers for individuals to privately manufacture firearms by milling out the incomplete lower. Once the lower is completed, the individual requires additional parts, including those for the upper and lower of the firearm, to finish the “build.” It would appear that OPPENHEIMER purchased both the upper and lower parts kit for a Glock 26, along

with two lasers and a tool kit. The following is listing of the information from the emails received by the michaelsylvain89@gmail.com from eBay, with addresses reduced to city and state:

Date	Item	Order #	Cost	Delivered To
3/28/2020	G26 Upper Slide Parts Kits For Glock Gen1-3 G26 P80 Polymer 80 PF94SC 9MM	01-04735-61919	\$157.36	Michael Sylvain Somerville, MA 02145
3/4/2020	ARMALASER TR6G GLOCK 26 , 27 & 33 SUPER-BRIGHT GREEN LASER with GRIP ACTIVATION	19-04608-33314	\$158.05	Michael Sylvain Somerville, MA, 02145
4/2/2020	ARMALASER TR6G GLOCK 26 , 27 & 33 SUPER-BRIGHT GREEN LASER with GRIP ACTIVATION	11-04734-89931	\$148.75	Michael Sylvain Somerville, MA 02145
3/31/2020	VISMby NcSTAR VTGUTK Ultimate Tool Kit for Glock Handguns	04-04735-50116	\$84.99	Michael Sylvain Somerville, MA, 02145
3/28/2020	GLOCK 26 Gen 1-3 Lower Parts Kit OEM 9MM Polymer 80 PF940SC Complete OEM Kit G26	04-04735-50115	\$104.95	Michael Sylvain Somerville, MA 02145

D. RECORDS FROM LE MELANGE

45. In the course of this investigation, investigators have reviewed records from Le Melange, LLC related to purchases of mixtures and substances utilized in the production of counterfeit Percocet pills that contain fentanyl. Specifically, the following orders and purchases were identified to have been made by OPPENHEIMER, either in his own name, the alias Michael Sylvain that is known utilized by OPPENHEIMER, or in the name of female associates of OPPENHEIMER, such as AD, HP, and JR. In total, OPPENHEIMER is believed to have purchased well over 200 kilograms of mixing agents, such as Premix and FirmPress, used in the production of counterfeit pills. The following is an accurate listing of historical orders from Le Melange, LLC, with the phone numbers reduced to the last four digits and addresses reduced to city and state.

Date / Order #	Customer Information	Shipping	Billing	Products	Cost
9/24/2019 / 190564	Customer: michael sylvain Email: clarkkent42@icloud.com	michael sylvain somerville, MA 02145	michael sylvain somerville, MA 02145	F, D & C Blue [Lake #2] Powdered Dye (For	\$165.80

		United States Phone: 4259	United States Phone: 4259	use with powdered ingredients or chocolates). oz. & lbs.: 1 oz. ProSolv 50 Premix Quantity: 5 lbs.	
11/5/2019 / 190647	Customer: michael sylvain Email: clarkkent42@icloud.com	michael sylvain somerville, MA 02145 United States Phone: 4259	michael sylvain somerville, MA 02145 United States Phone: 4259	ProSolv 50 Premix Quantity: 1 lb.	\$45.17
11/5/2019 / 190648	Customer: michael sylvain Email: clarkkent42@icloud.com	michael sylvain somerville, MA 02145 United States Phone: 4259	michael sylvain somerville, MA 02145 United States Phone: 4259	ProSolv 50 Premix Quantity: 10 lbs.	\$283.07
12/19/2019 / 190730	Customer: michael sylvain Email: clarkkent42@icloud.com	Michael Sylvain United States Phone: 4259	[AD] Everett, MA 02149 United States Phone: 4259	ProSolv 50 Premix Quantity: 5 lbs. ProSolv 50 Premix Quantity: 10 lbs.	\$527.00
12/25/2019 / 190734	Customer: michael sylvain Email: clarkkent42@icloud.com	michael sylvain somerville, MA 02145 United States Phone: 4259	Schuyler Oppenheimer Somerville, MA 02143 United States Phone: 6457	ProSolv 50 Premix Quantity: 20 Kg (44 pounds)	\$1,006.18
1/13/2020 / 201028	Customer: michael sylvain Email: Michaelsylvain89@gmail.com	michael sylvain somerville, MA 02145 United States Phone: 8359	Schuyler Oppenheimer Somerville, MA 02143 United States Phone: 8359	Stearic Acid Flakes oz. ft lbs.: 1 lb. F, D ft C Blue [Lake #2] Powdered Dye (For use with powdered ingredients or chocolates). oz. ft lbs.: 4 oz.	\$46.67
1/14/2020 / 201029	Customer: michael sylvain Email: michaelsylvain89@gmail.com	michael sylvain somerville, MA 02145 United States Phone: 4259	Schuyler Oppenheimer Somerville, MA 02143 United States Phone: 8359	ProSolv 50 Premix Quantity: 15 Kg (33 lbs.) (\$22.00 lb.)	\$793.31
4/27/2020 / 201253	Customer: Michael Sylvain Email: michaelsylvain89@gmail.com	Michael Sylvain Somerville, MA 02145 United States Phone: 6595	schuyler oppenheimer Somerville, MA 02143 United States Phone: 6595	ProSolv 50 Premix Quantity: 10 Kg (22 lbs.) (\$29.00 lb.) Rondo Digital Scale with Stainless Steel Bowl Microcrystalline Cellulose Quantity: 1 lb.	\$692.60
5/16/2020 / 201297	Customer: Michael Sylvain Email: michaelsylvain89@gmail.com	michael sylvain somerville, MA 02145	schuyler oppenheimer .	ProSolv 50 Premix Quantity: 10 Kg (22 lbs.) (\$29.00	\$998.93

		United States Phone: 6595	somerville, MA 02143 United States Phone: 6595	lb.)	
9/10/2020 / 201500	Customer: Michael Sylvain Email: michaelsylvain89@gmail.com	michael sylvain somerville, MA 02145 United States Phone: 6595	schuyler oppenheimer somerville, MA 02143 United States Phone: 6595	Rondo Digital Scale with Stainless Steel Bowl 8 oz Natural, Incremented Plastic Measuring Cup/Scoop Quantity: 12 each FirmPress Powder for Tablet Making Quantity: 20 Kg (44 pounds) (\$27.00 lb.)	\$1,475.73
1/11/2021 / 210022	Customer: [HP] Email: [HP]	[HP] Boston , MA 02122 United States Phone: 9624	[HP] Las Vegas, NV 89128 United States Phone: 9624	FirmPress Powder for Tablet Making Quantity: 20 Kg (44 pounds) (\$27.00 lb.)	\$1,273.55
5/26/2021 / 210345	Customer: Schuyler Oppenheimer Email: Schuyleroppenheimer@gmail.com	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149- 2901 United States Phone: 6595	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149- 2901 United States Phone: 6595	FirmPress Powder for Tablet Making Quantity: 15 Kg (30 lbs.) (\$28.00 lb)	\$1,002.40
8/6/2021 / 210492	Customer: [HP] Email: [HP]	[HP] United States Phone: 9624	[HP] United States Phone: 9624	FirmPress Powder for Tablet Making Quantity: 40 Kg (88 lbs.) (\$25.00 lb.)	\$2,376.02
1/3/2022 / 220031	Customer: [HP] Email: [HP]	[HP] United States Phone: 9624	[HP] United States Phone: 9624	Stearic Acid oz. ft lbs.: 5 lbs. Firm Press Powder for Tablet Making Quantity: 20 Kg (44 lbs.) (\$27.00 lb.)	\$1,317.40
6/18/2022 / 220307	Customer: Schuyler Oppenheimer Email: Schuyleroppenheimer@gmail.com	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149 United States Phone: 6009	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149 United States Phone: 6009	FirmPress Powder for Tablet Making Quantity: 10 Kg (22 lbs.) (\$29.00 lb)	\$698.20
7/13/2022 / 220350	Customer: [HP] Email: schuyleroppenheimer@gmail.com	[HP] Dorchester, MA 02122 United States Phone: 6009	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149 United States	Firm Press Powder for Tablet Making Quantity: 15 Kg (33 lbs.) (\$28.00 lb)	\$1,003.24

			Phone: 6009		
10/2/2022 / 220464	Customer: Schuyler Oppenheimer Email: Schuyleroppenheimer@gmail.com	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149-2901 United States Phone: 6009	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149-2901 United States Phone: 6009	FirmPress Powder for Tablet Making Quantity: 15 Kg (33 lbs.) (\$28.00 lb)	\$1,003.24
12/28/2022 / 220599	Customer: Schuyler Oppenheimer Email: Schuyleroppenheimer@gmail.com	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149 United States Phone: 6009	Schuyler Oppenheimer 12 Oakland Ave Everett, MA 02149 United States Phone: 6009	FirmPress Powder for Tablet Making Quantity: 20 Kg (44 lbs.) (\$27.00 lb.)	\$1,297.35
6/30/2023	Customer: Schuyler Oppenheimer Email: Schuyleroppenheimer@gmail.com	Schuyler Oppenheimer Medford, MA 02155 United States Phone: 6009	Schuyler Oppenheimer Everett, MA 02149-2901 United States Phone: 6595	F, D & C Yellow [Lake] Powdered Dye (For use with powdered ingredients or chocolates). oz. & lbs.: 1 lb.	\$117.60
4/11/2024 / 240154	Customer: [BP] Email: Schuyleroppenheimer@gmail.com	[BP] Cranston, RI 02910	[SB] Warwick, RI 02889	F, D & C Yellow [Lake] Powdered Dye (For use with powdered ingredients or chocolates). oz. & lbs.: 1 lb. ProSolv 90 Pure No Additives Quantity: 10 lbs (\$32.00 lb.)	\$369.22

46. The Le Melange invoices listed above are all believed to have been purchased by OPPENHEIMER under his own name, through the alias Michael Sylvain, or utilizing female associates. The billing addresses, shipping addresses, email addresses and phone numbers utilized are all known to have been accessible to or controlled by OPPENHEIMER. Additionally, all of the purchases were for materials that have utility in the production of counterfeit pills.

47. The purchased products include: large quantities of Promix, or Premix filler used to adulterate the fentanyl and form the pills, dyes, and other additives. Significantly, some purchased quantities of the mixture additives exceeded 20 pounds and 40 pounds, suggesting that OPPENHEIMER is engaged in large-volume manufacturing of counterfeit pills. These weights of filler would equate to

hundreds of thousands of counterfeit pills, assuming the weight of each pill to be 0.10 grams, consistent with the recipes recovered from the trash pulls.

48. The most recent package ordered by OPPENHEIMER through Le Melange was sent to a female associate B.P. to the residential address of B.P. However, OPPENHEIMER did not order these items to that address nor use his own credit card. The package was addressed to B.P., at 825 Pontiac Avenue, Cranston, RI and purchased with the credit card of OPPENHEIMER's mother. Investigators observed OPPENHEIMER taking receipt of the Le Melange delivery in the mail room of B.P.'s apartment complex and transporting them to his former address in Rhode Island. A photo of OPPENHEIMER taking possession of the package follows:



E. 2/17/2023, CONTROLLED DELIVERY OF PILL PRESS PART

49. On February 17, 2023, Customs and Border Patrol officers from the Boston Targeting Unit along with NTC Cargo Unit targeted a FedEx package for investigation. The package was inspected, and it was discovered that the item in the package was a desktop tablet press boot, which investigators believe to be a replacement part for a pill press. The shipment was then detained and transported to the South Boston A-TCET in pursuant to drug paraphernalia importation laws and statutes, specifically 19 UCS 1595a(c)(2)(A), 21 U.S.C. § 863(a)(3), 21 USC § 863(d).

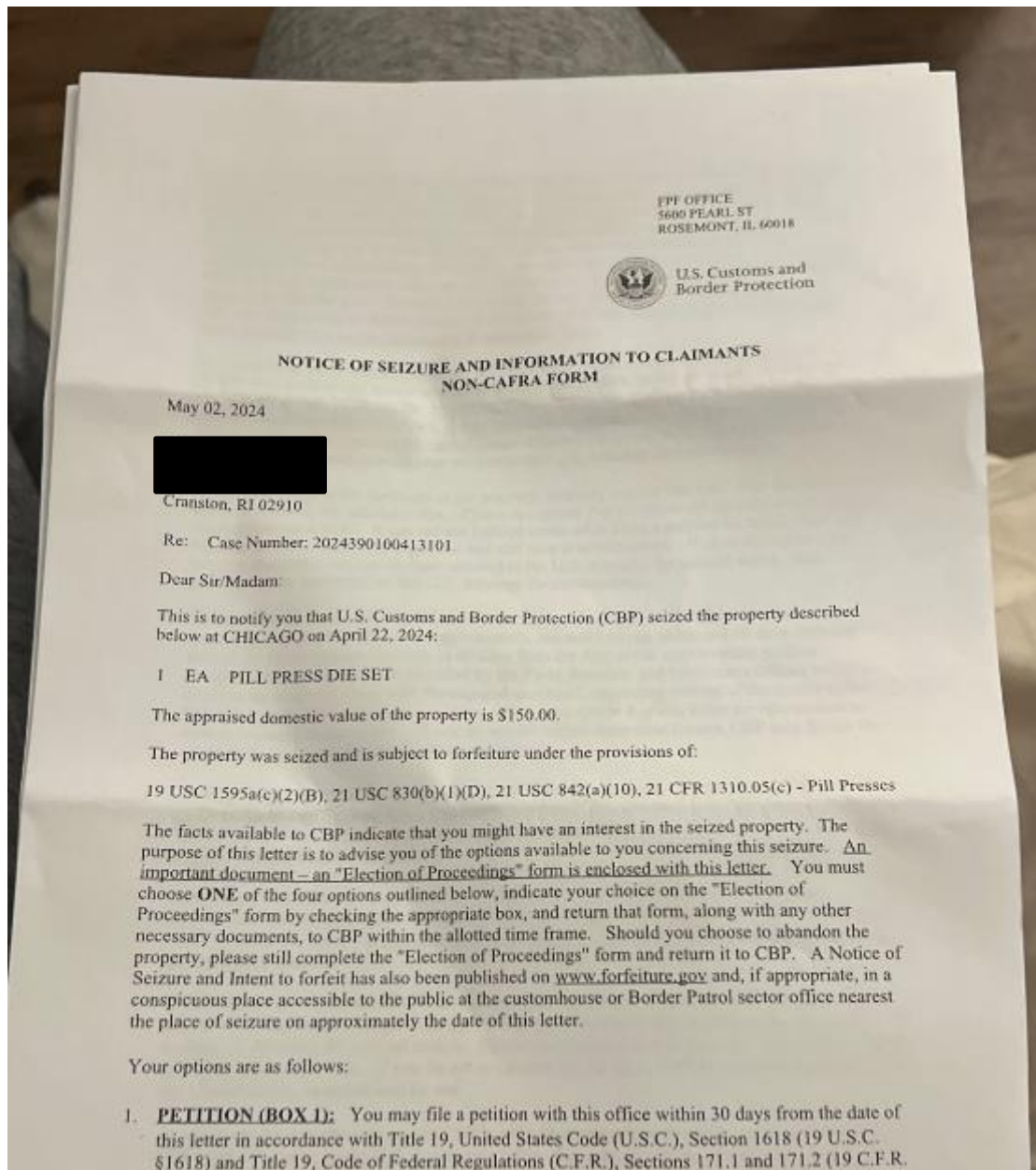
50. The packaged has been shipped from Shanghai, CN to Schuyler OPPENHEIMER's known residence at 12 Oakland Ave, Everett, MA. The item seized was a boot for a pill press.

51. On February 24, 2023, investigators conducted a controlled delivery of the pill press part and left the item on the front steps of 12 Oakland Avenue, Everett, MA. Shortly after leaving the item, OPPENHEIMER was observed taking possession of the delivered from the front steps and entering 12 Oakland Avenue.

F. APRIL 2024, SEIZURE OF PILL DYE

52. In May 2024, investigators learned from HSI agents that a woman, later identified identified as OPPENHEIMER's girlfriend with the initials B.P. was the intended recipient of a set of pill press molds that were intercepted by Customs and Border Patrol Agents in April 2024. The intercepted shipment occurred at a time period consistent with OPPENHEIMER's order of materials from Le Melange LLC that also utilized B.P.'s name and same Cranston, RI address. The package was shipped from China and the shipment was manifested as "PLASTICS, STATUETTES AND OTHER ORNAMENTAL ARTICLES" with a value of \$10.00 USD. The shipment was appraised by blanket appraisal sheet with a domestic value of \$150 USD. On April 22, 2024, CBPO Navarro confirmed it was a pill press die kit containing 3 pieces of metal. One piece of metal had a mold of what appears to have the letter M on it and another piece had the number 30 on it.

53. In the data derived from OPPENHEIMER's cellular phone, investigators identified a photograph of a letter from Customs and Border Patrol to B.P. concerning the shipment. That photograph follows:



54. Investigators were provided with photographs of the seized package and its contents. It appears that the pill dyes were intended for use in the creation of counterfeit Oxycodone 30 mg pills bearing the "M" "30" imprint. Investigators are familiar with these pills and know that these counterfeit pills often contain fentanyl. Review of OPPENHEIMER's recipe notes detailed above and analysis of the pills seized during the investigation reveals that OPPENHEIMER does in fact utilize fentanyl in the counterfeit "M" "30" pills that he manufactures.



G. JUNE 2024, CONTROLLED PURCHASE

55. On a date after June 10, 2024, a cooperating witness, whose name I am omitted to preserve their anonymity, conducted a controlled purchase of more than 200 grams of cocaine. This transaction was captured on audio and video recording. This transaction took place in the vicinity of 36 Parker Street, Cambridge, MA, which is OPPENHEIMER's residence. On the date and time of the transaction, OPPENHEIMER was subject to pretrial release conditions of home confinement for his pending Malden District Court case. During the course of the transaction, investigators made observations consistent with

OPPENHEIMER providing the controlled substances to the dealer who then sold the controlled substances to the cooperating witness. Based on observation made by investigators, investigators believe that the cocaine were stored by OPPENHEIMER within 36 Parker Street, Cambridge, MA, prior to their sale to the cooperating witness. Following the purchase, investigators conducted a field test on the suspected drugs, which tested positive for the presence of cocaine.

III. PPP LOAN SUBMISSIONS

56. The U.S. Small Business Administration (“SBA”) was an agency of the United States government authorized to enable and provide for loans, guaranteed by the government, both directly and through banks, credit unions, and other lenders.

57. FOUNTAINHEAD SBF LLC (“FOUNTAINHEAD”) was based in Florida. It was an approved lender of “PPP” loans, which are further described below.

58. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to Americans suffering the economic effects of the COVID-19 pandemic.

59. The CARES Act authorized forgivable loans to small businesses and non-profits for job retention and certain other expenses through the PPP.

60. In order to obtain a PPP loan, a qualifying business had to submit a PPP loan application signed by an authorized representative of the business. The PPP loan application required the business, through its authorized representative, to acknowledge the program rules and make certain affirmative certifications. In the PPP loan application, the small business, through its authorized representative, had to state, among other things, its (i) number of employees and (ii) average monthly payroll expenses. These figures were used to calculate the amount of a PPP loan the business was eligible to receive; typically, a business was eligible to receive two-and-a-half times its average monthly payroll expenses. In addition, businesses applying for a PPP loan had to provide documentation of their payroll expenses.

61. A PPP loan application had to be processed by an authorized SBA lender. In most instances, applicants submitted applications and supporting documents to PPP lenders electronically.

Kabbage, Bluevine, and other PPP lenders typically recorded the internet protocol (“IP”) address from which applications were electronically submitted.

62. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were 100 percent guaranteed by the SBA. Data from the application was regularly transmitted by the lender to the SBA in the course of processing the loan.

63. PPP loan proceeds had to be used by the business on certain permissible expenses, including payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these permissible expenses within a designated period of time and used a certain percentage of the PPP loan proceeds on payroll expenses.

64. Investigators have reviewed documents from FOUNTAINHEAD SBF LLC related to two Paycheck Protection Program loans that OPPENHEIMER obtained on behalf of his purported self-employment in a company referred to as “Officialsped” in 2021. These two loans totaled over \$40,000 and were forgiven in March of 2022. Investigators believe that OPPENHEIMER submitted a false income information and a fraudulent 2019 Form 1040 Individual Tax Return in support of the PPP Loan applications in order to substantiate the business income necessary to qualify for such a loan. Additionally, review of the bank statements for the account into which the fraudulently obtained PPP funds were deposited reveals that business expenses were not paid for with the proceeds from the loans. In fact, the fraudulently obtained PPP funds appear to have been spent on personal investments and Ubereats purchases.

A. SBA Loan #: 2244928807

65. On or about April 2, 2021, Schuyler OPPENHEIMER applied for a loan that was part of the Small Business Administration’s PPP. OPPENHEIMER identified himself as “self-employed.” The loan that OPPENHEIMER applied for was identified to be for “payroll costs” in the amount of \$20,833, which was an amount calculated from the gross income of the d/b/a identified by OPPENHEIMER as “officialsped”. The Borrow Application Form submitted by OPPENHEIMER listed the Total Amount of Gross Income to be \$175,244.

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Paycheck Protection Program
Borrower Application Form for Schedule C Filers Using Gross Income
 Revised March 18, 2021

OMB Control No.: 3245-0407
 Expiration Date: 9/30/2021

**AN APPLICANT MAY USE THIS FORM ONLY IF THE APPLICANT FILES AN IRS FORM 1040, SCHEDULE C, AND
 USES GROSS INCOME TO CALCULATE PPP LOAN AMOUNT**

Check One: <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Independent contractor <input checked="" type="checkbox"/> Self-employed individual <input type="checkbox"/> Single member LLC (self-employed individual) <input type="checkbox"/> Qualified joint venture (self-employed individual)	DBA or Tradename (if applicable)	Year of Establishment (if applicable)
	officialsped	01/01/2017
Business Legal Name	NAICS Code	Applicant (including affiliates, if applicable) Meets Size Standard (check one):
Schuyler Oppenheimer	448150	<input checked="" type="checkbox"/> No more than 500 employees (or 300 employees, if applicable) unless "per location" exception applies <input type="checkbox"/> SBA industry size standards <input type="checkbox"/> SBA alternative size standard
Business Address (Street, City, State, Zip Code - No P.O. Box addresses allowed)	Business TIN (EIN, SSN, ITIN)	Business Phone
12 Oakland ave Everett, MA 02149	[REDACTED] 3410	[REDACTED] 6595
	Primary Contact	Email Address
	Schuyler Oppenheimer	schuyleroppenheimer@gmail.com
Total Amount of Gross Income (from IRS Form 1040, Schedule C, Line 7)	Tax Year Used for Gross Income	Number of Employees (including owners):
\$175,244.00	<input checked="" type="checkbox"/> 2019 <input type="checkbox"/> 2020	1

If you do not have any employees (other than owners), complete this table:

A. Your gross income amount from 2019 or 2020 IRS Form 1040, Schedule C, line 7:	\$175,244.00	B. Divide A by 12 (if more than \$8,333.33, enter \$8,333.33):	\$8,333.33	x 2.5 + EIDL (Do Not Include Any EIDL Advance) equals Loan Request Amount:	\$20,833.00
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58. In support of this loan application, OPPENHEIMER submitted an unsigned 2019 Form 1040 US Individual Tax Return under his name and social security number ending in 3410, listing OPPENHEIMER as filing single. This 2019 Form 1040 listed \$106,314 in taxable income. The Schedule C submitted as part of the Form 1040 indicated that all of this income was from self-employment and that the principal business of profession was "Clothing Accessories Store" and that it was located at 12 Oakland Avenue, Everett, Massachusetts. The Schedule C indicated that his adjusted gross income for 2019 was \$175,244 and that he had \$106,314 in taxable income for the 2019 calendar year.

SCHEDULE C (Form 1040 or 1040-SR)		Profit or Loss From Business (Sole Proprietorship)		OMB No. 1545-0074	
Department of the Treasury Internal Revenue Service (99)		▶ Go to www.irs.gov/ScheduleC for instructions and the latest information. ▶ Attach to Form 1040, 1040-SR, 1040-NR, or 1041; partnerships generally must file Form 1065.		2019 Attachment Sequence No. 09	
Name of proprietor SCHUYLER OPPENHEIMER				Social security number (SSN) 5410	
A Principal business or profession, including product or service (see instructions) CLOTHING ACCESSORIES STORE				B Enter code from instructions 448150	
C Business name. If no separate business name, leave blank.				D Employer ID number (EIN) (see instr.)	
E Business address (including suite or room no.) ▶ 12 OAKLAND AVE City, town or post office, state, and ZIP code EVERETT MA 02149					
F Accounting method: (1) <input checked="" type="checkbox"/> Cash (2) <input type="checkbox"/> Accrual (3) <input type="checkbox"/> Other (specify) ▶					
G Did you "materially participate" in the operation of this business during 2019? If "No," see instructions for limit on losses <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
H If you started or acquired this business during 2019, check here <input type="checkbox"/>					
I Did you make any payments in 2019 that would require you to file Form(s) 1099? (see instructions) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
J If "Yes," did you or will you file required Forms 1099? <input type="checkbox"/> Yes <input type="checkbox"/> No					
Part I Income					
1 Gross receipts or sales. See instructions for line 1 and check the box if this income was reported to you on Form W-2 and the "Statutory employee" box on that form was checked <input type="checkbox"/>				1 175244	
2 Returns and allowances				2 0	
3 Subtract line 2 from line 1				3 175244	
4 Cost of goods sold (from line 42)				4 0	
5 Gross profit. Subtract line 4 from line 3				5 175244	
6 Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)				6 0	
7 Gross income. Add lines 5 and 6				7 175244	
Part II Expenses. Enter expenses for business use of your home only on line 30.					
8 Advertising				8 6400	
9 Car and truck expenses (see instructions)				9 0	
10 Commissions and fees				10 0	
11 Contract labor (see instructions)				11 32000	
12 Depletion				12 0	
13 Depreciation and section 179 expense deduction (not included in Part III) (see instructions)				13 0	
14 Employee benefit programs (other than on line 19)				14 0	
15 Insurance (other than health)				15 0	
16 Interest (see instructions):					
a Mortgage (paid to banks, etc.)				16a 0	
b Other				16b 0	
17 Legal and professional services				17 0	
18 Office expense (see instructions)				18 2745	
19 Pension and profit-sharing plans				19 0	
20 Rent or lease (see instructions):					
a Vehicles, machinery, and equipment				20a 0	
b Other business property				20b 0	
21 Repairs and maintenance				21 0	
22 Supplies (not included in Part III)				22 1945	
23 Taxes and licenses				23 0	
24 Travel and meals:					
a Travel				24a 0	
b Deductible meals (see instructions)				24b 0	
25 Utilities				25 4600	
26 Wages (less employment credits)				26 0	
27a Other expenses (from line 48)				27a 0	
b Reserved for future use				27b 0	
28 Total expenses before expenses for business use of home. Add lines 8 through 27a				28 47690	
29 Tentative profit or (loss). Subtract line 28 from line 7				29 127554	
30 Expenses for business use of your home. Do not report these expenses elsewhere. Attach Form 8829 unless using the simplified method (see instructions). Simplified method filers only: enter the total square footage of: (a) your home: _____ and (b) the part of your home used for business: _____. Use the Simplified Method Worksheet in the instructions to figure the amount to enter on line 30					
31 Net profit or (loss). Subtract line 30 from line 29.				31 127554	
• If a profit, enter on both Schedule 1 (Form 1040 or 1040-SR), line 3 (or Form 1040-NR, line 13) and on Schedule SE, line 2 . (If you checked the box on line 1, see instructions). Estates and trusts, enter on Form 1041, line 3 . • If a loss, you must go to line 32. 32 If you have a loss, check the box that describes your investment in this activity (see instructions). • If you checked 32a, enter the loss on both Schedule 1 (Form 1040 or 1040-SR), line 3 (or Form 1040-NR, line 13) and on Schedule SE, line 2 . (If you checked the box on line 1, see the line 31 instructions). Estates and trusts, enter on Form 1041, line 3 . • If you checked 32b, you must attach Form 6198 . Your loss may be limited.					
				32a <input type="checkbox"/> All investment is at risk. 32b <input type="checkbox"/> Some investment is not at risk.	

For Paperwork Reduction Act Notice, see the separate instructions. Schedule C (Form 1040 or 1040-SR) 2019

59. On April 2, 2021, OPPENHEIMER signed the application and noted that he understood that making a false statement in the loan application could subject him to criminal penalties. This loan application was submitted digitally via the internet. A screen capture of the signature block for the loan application follows:

I further certify that the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects. I understand that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law, including under 18 U.S.C. 1001 and 3571 by imprisonment of not more than five years and/or a fine of up to \$250,000; under 15 U.S.C. 645 by imprisonment of not more than two years and/or a fine of not more than \$5,000; and, if submitted to a federally insured institution, under 18 U.S.C. 1014 by imprisonment of not more than thirty years and/or a fine of not more than \$1,000,000.

SBA Form 2483-C (3/21)

3

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Paycheck Protection Program
Borrower Application Form for Schedule C Filers Using Gross Income
 Revised March 18, 2021

DS

I acknowledge that the Lender will confirm the eligible loan amount using required documents submitted. I understand, acknowledge, and agree that the Lender can share any tax information that I have provided with SBA's authorized representatives, including authorized representatives of the SBA Office of Inspector General, for the purpose of compliance with SBA Loan Program Requirements and all SBA reviews.

DocuSigned by:

Signature of Authorized Representative of Applicant

Schuyler Oppenheimer

Print Name

04-02-2021

Date

Owner

Title

60. As part of the loan application, OPPENHEIMER affirmed that the loan proceeds would be used for business purposes. Specifically, OPPENHEIMER affirmed that:

- All loan proceeds will be used only for business-related purposes (including payroll and other proprietor expenses, which is business expenses plus owner compensation, as defined in the interim final rule posted on March 3, 2021) as specified in the loan application and consistent with the Paycheck Protection Program Rules including the prohibition on using loan proceeds for lobbying activities and expenditures. If the Applicant is an Internet-only news or periodical publisher that became eligible for a loan under Section 5001 of the American Rescue Plan Act of 2021, the proceeds of the loan will be used to support expenses at the component of the business or organization that supports local or regional news.
- The funds will be used to retain workers and maintain payroll; or make payments for mortgage interest, rent, utilities, covered operations expenditures, covered property damage costs, covered supplier costs, and covered worker protection expenditures as specified under the Paycheck Protection Program Rules; I understand that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud.

61. This loan application was approved. This loan was identified as SBA Loan #: 2244928807. On or about April 11, 2021, OPPENHEIMER executed a note and loan agreement with the SBA and the lender with respect to the \$20,833 loan. On or about April 20, 2021, the loan was paid to OPPENHEIMER by the lender who was "Fountainhead SBF LLC", and the \$20,833 was transmitted to a bank account designated by OPPENHEIMER. On or about March 14, 2022, OPPENHEIMER sought forgiveness of the PPP loan number

2244928807, which was granted. On or about March 18, 2022, the SBA remitted to the lender the balance of \$20,833 and \$192.13 interest as part of the PPP loan forgiveness program.

B. SBA Loan #: 5859658907

62. On or about April 13, 2021, Schuyler OPPENHEIMER applied for a second loan that was part of the SBA's Paycheck Protection Program (PPP). OPPENHEIMER identified himself as a "self-employed" individual. The loan applied for was identified to be for "payroll costs" in the amount of \$20,833 that was calculated from the gross income of the d/b/a identified by OPPENHEIMER as "officialsped".

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Paycheck Protection Program
Second Draw Borrower Application Form for Schedule C Filers Using Gross Income
 Revised March 18, 2021

OMB Control No.: 3245-0417
 Expiration Date: 9/30/2021

AN APPLICANT MAY USE THIS FORM ONLY IF THE APPLICANT FILES AN IRS FORM 1040, SCHEDULE C, AND USES GROSS INCOME TO CALCULATE PPP LOAN AMOUNT

Check One: <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Independent contractor <input checked="" type="checkbox"/> Self-employed individual <input type="checkbox"/> Single member LLC (self-employed individual) <input type="checkbox"/> Qualified joint venture (self-employed individual)	DBA or Tradename (if applicable)		Year of Establishment (if applicable)
	officialsoped		01/01/2017
Business Legal Name		NAICS Code	
Schuyler Oppenheimer		448150	
Business Address (Street, City, State, Zip Code - No P.O. Box addresses allowed)		Business TIN (EIN, SSN, ITIN)	Business Phone
12 Oakland ave Everett, MA 02149		3410	6595
		Primary Contact	Email Address
		Schuyler Oppenheimer	schuyleroppenheimer@gmail.com
Total Amount of Gross Income (from IRS Form 1040, Schedule C, Line 7)	Tax Year Used for Gross Income	Number of Employees (including owners and affiliates, if applicable; may not exceed 300 unless "per location" exception applies):	
\$175,244.00	<input checked="" type="checkbox"/> 2019 <input type="checkbox"/> 2020	1	

If you do not have any employees (other than owners), complete this table:

A. Your gross income amount from 2019 or 2020 IRS Form 1040, Schedule C, line 7	\$175,244.00	B. Divide A by 12 (if more than \$8,333.33, enter \$8,333.33):	\$8,333.33	x 2.5 (or x 3.5 for NAICS 72 applicants) (may not exceed \$2,000,000):	\$20,833.00
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If you have employees (other than owners), complete this table:



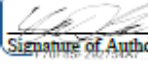
A. Your 2019 or 2020 IRS Form 1040, Schedule C, line 7 amount, minus the sum of line 14, line 19, and line 26:	\$	B. Divide A by 12 (if more than \$8,333.33, enter \$8,333.33):	\$	C. Average Monthly Payroll for Employees (not including owners)	\$
Add B and C:	\$	x 2.5 (or x 3.5 for NAICS 72 applicants) (may not exceed \$2,000,000):		\$	

Purpose of the loan (select all that apply):	<input checked="" type="checkbox"/> Payroll Costs (including proprietor expenses, equal to business expenses plus owner compensation)	<input type="checkbox"/> Rent / Mortgage Interest	<input type="checkbox"/> Utilities	<input type="checkbox"/> Covered Operations Expenditures
	<input type="checkbox"/> Covered Property Damage	<input type="checkbox"/> Covered Supplier Costs	<input type="checkbox"/> Covered Worker Protection Expenditures	<input type="checkbox"/> Other (explain):
PPP First Draw SBA Loan Number:	2244928807			

63. In support of this loan application, OPPENHEIMER submitted the 2019 Form 1040 US Individual Tax Return under his name and social security number ending in 3410. This document, as before, indicated that OPPENHEIMER's adjusted gross income was \$175,244. The Schedule C submitted as part of the Form 1040 indicated that all of this income was from self-employment and that the principal business of profession was "Clothing Accessories Store" and that it was located at 12 Oakland Avenue, Everett,

Massachusetts. The Schedule C indicated that his adjusted gross income for 2019 was \$175,244 and that he had \$106,314 in taxable income for the 2019 calendar year.

64. On April 13, 2021, OPPENHEIMER signed the application and noted that he understood that making a false statement in the loan application could subject him to criminal penalties. This loan application was submitted digitally via the internet. A screen capture of the signature block for the loan application follows:

 <p>I further certify that the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects. I understand that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law, including under 18 U.S.C. 1001 and 3571 by imprisonment of not more than five years and/or a fine of up to \$250,000; under 15 U.S.C. 645 by imprisonment of not more than two years and/or a fine of not more than \$5,000; and, if submitted to a federally insured institution, under 18 U.S.C. 1014 by imprisonment of not more than thirty years and/or a fine of not more than \$1,000,000.</p>	 <p>I acknowledge that the Lender will confirm the eligible loan amount using required documents submitted. I understand, acknowledge, and agree that the Lender can share any tax information that I have provided with SBA's authorized representatives, including authorized representatives of the SBA Office of Inspector General, for the purpose of compliance with SBA Loan Program Requirements and all SBA reviews.</p>
<p>DocuSigned by:</p>  <p>Signature of Authorized Representative of Applicant</p> <p>Schuyler Oppenheimer</p> <p>Print Name</p>	<p>04-13-2021</p> <p>Date</p> <p>Owner</p> <p>Title</p>

65. As part of the loan application, OPPENHEIMER affirmed that the loan proceeds would be used for business purposes. Specifically, OPPENHEIMER affirmed that:

- All loan proceeds will be used only for business-related purposes (including payroll and other proprietor expenses, which is business expenses plus owner compensation, as defined in the interim final rule posted on March 3, 2021) as specified in the loan application and consistent with the Paycheck Protection Program Rules including the prohibition on using loan proceeds for lobbying activities and expenditures. If the Applicant is an Internet-only news or periodical publisher that became eligible for a loan under Section 5001 of the American Rescue Plan Act of 2021, the proceeds of the loan will be used to support expenses at the component of the business or organization that supports local or regional news.
- The funds will be used to retain workers and maintain payroll; or make payments for mortgage interest, rent, utilities, covered operations expenditures, covered property damage costs, covered supplier costs, and covered worker protection expenditures as specified under the Paycheck Protection Program Rules; I understand that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud.

66. This loan application was approved. This loan was identified as SBA Loan #: 5859658907. On or about April 30, 2021, OPPENHEIMER executed a note with the SBA with respect to the \$20,833 loan.

On or about May 4, 2021, the loan was paid to OPPENHEIMER by the lender who was “Fountainhead SBF LLC”, and the \$20,833 was transmitted to a bank account designated by OPPENHEIMER. On or about March 14, 2022, OPPENHEIMER sought forgiveness of the PPP loan number 5859658907, which was granted. On or about March 18, 2022, the SBA remitted to the lender the balance of \$20,833 and \$184.02 in interest as part of the PPP loan forgiveness program.

C. ACTUAL 2019 FORM 1040 TAX RETURN

67. Investigators obtained and reviewed OPPENHEIMER’s filed 2019 Form 1040 US Individual Tax Return that was signed and submitted to the Internal Revenue Service (the “True 2019 Form 1040”). The True 2019 Form 1040 listed OPPENHEIMER and his wife, J.R., as married and filing jointly for the 2019 calendar year. The True 2019 Form 1040 listed total “Wages, Salaries, Tips, Etc. “ to be \$55,742, and the Taxable Income to be \$31,342. The True 2019 Form 1040 was submitted by OPPENHEIMER and J.R. on October 13, 2020. The True 2019 Form 1040 lists no self-employment income, contains no “Schedule C” for self-employment income, and there is a Form W-2 for OPPENHEIMER that listed him as an employee of a gym, earning \$41,507 for the 2019 tax year.

68. On March 3, 2023, the Internal Revenue Service confirmed that OPPENHEIMER has not filed tax returns for the periods of December 31, 2020, through December 31, 2021.

69. On March 3, 2023, the Internal Revenue Service further confirmed that OFFICIALSPED LLC, and OFFICIAL SPED HOLDINGS CORP. have not filed tax returns for the period of December 31, 2017 through December 31, 2021.

70. Based on review of documents obtained from the Internal Revenue Service, investigators know that OPPENHEIMER submitted false self-employment income and tax information and false tax documents to FOUNTAINHEAD SBF LLC in support of his two PPP Loan Applications.

D. Cambridge Savings Bank Account Records

71. I have reviewed records from the Cambridge Savings Bank related to an account held by OPPENHEIMER at that institution with an account number ending in 3280. This was a personal account opened by OPPENHEIMER in his name, and is not under any business or corporate entity.

72. In the statements for the account, I observed deposit entries showing the deposits from the FOUNTAINHEAD SBF listing a description as “PPP LOAN DISBURSEMENT FOR SBA LOAN”. Each of the two deposits was for \$20,833.

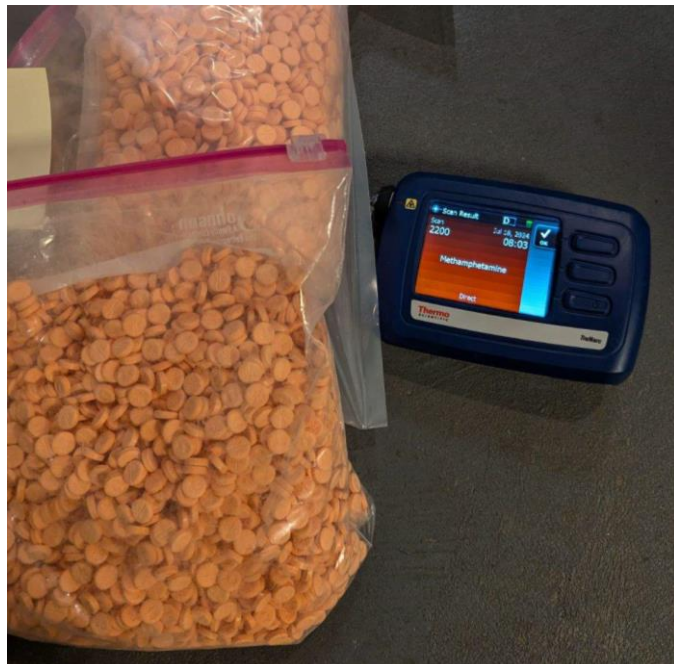
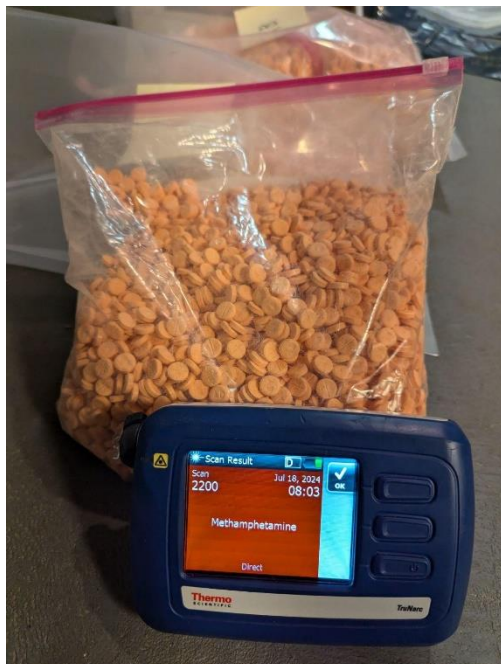
- a. The first \$20,833 deposit is listed on April 22, 2021. Prior to this deposit, the account held a \$1,760 balance.
- b. The second \$20,833 deposit is listed on May 7, 2021. Prior to this deposit, the account held a \$285.70 balance.

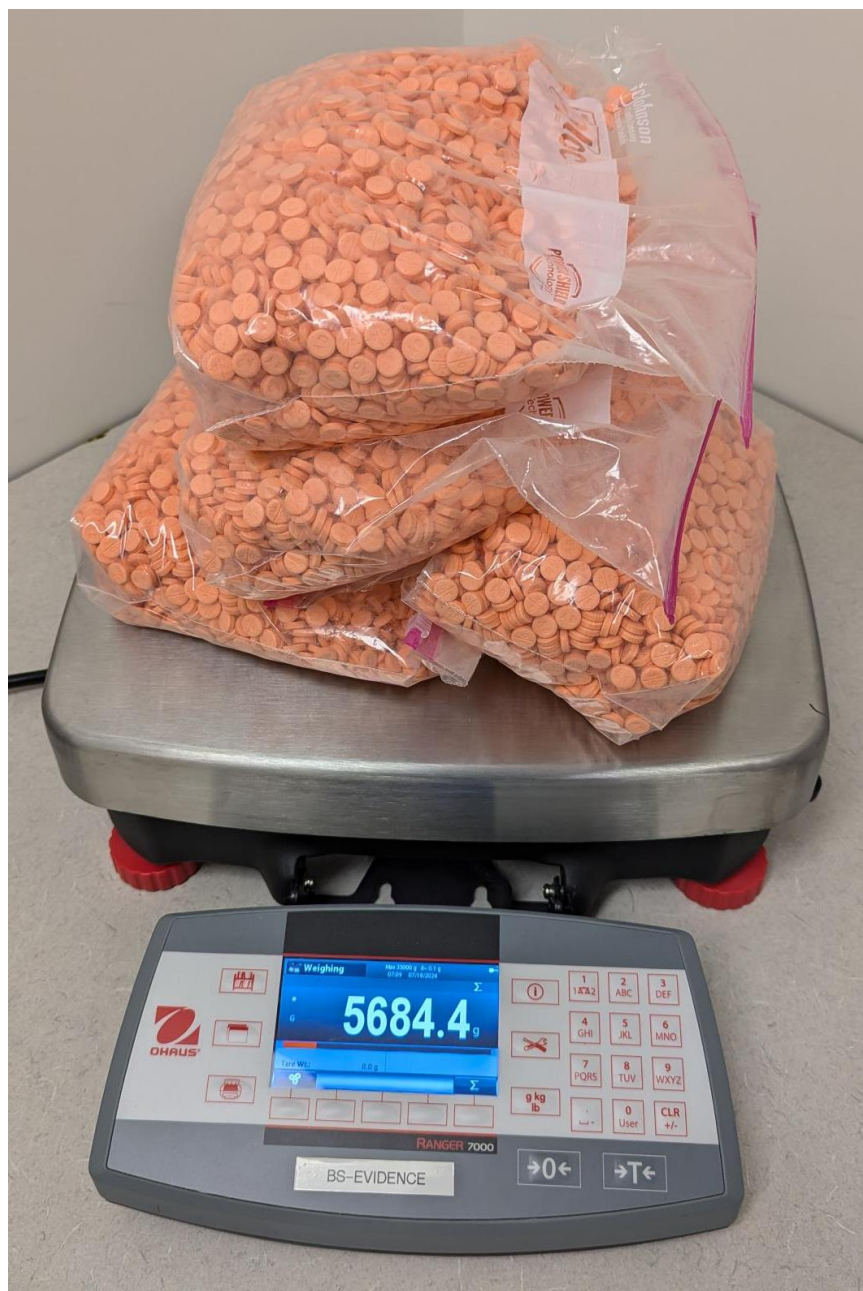
IV. SEARCH OF 36 PARKER STREET, UNIT 8, CAMBRIDGE, MA

73. On July 10, 2024, investigators obtained a search warrant for OPPENHEIMER’s residence at 36 Parker Street, Unit 8, Cambridge, MA, and for the person of Schuyler OPPENHEIMER. On July 17, 2024, investigators executed the search warrants for the person of SCHUYLER OPPENHEIMER, and 36 Parker Street.

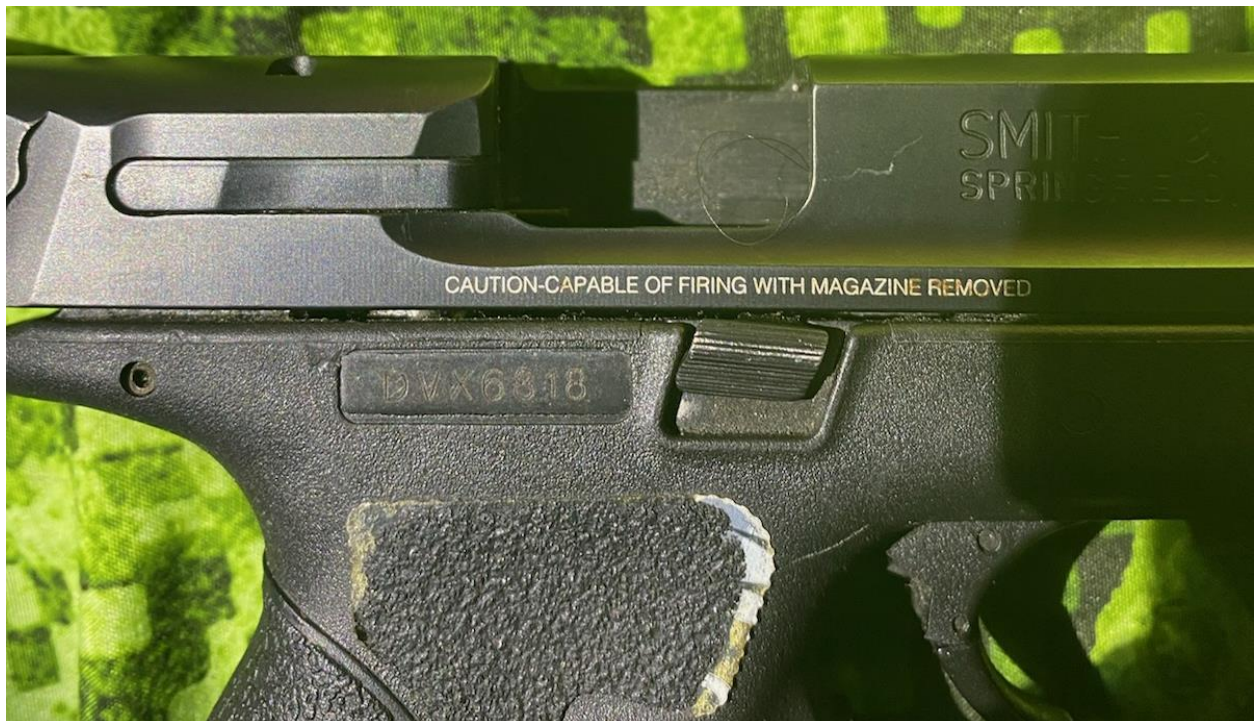
74. During the entry to 36 Parker Street, investigators observed Schuyler OPPENHEIMER in the living room as he exited a bedroom. During the search of the bedroom, investigators located drugs and a firearm, and observed personal belongings of OPPENHEIMER. Among the items located in the bedroom were the following:

- a. Four large freezer bags containing orange pills counterfeit Adderall pills believed to contain methamphetamine. Each of the bags is believed to contain thousands of pressed pills. These items tested positive on a TruNarc preliminary field test device for the presence of methamphetamine. In total, the bags and packaging weighed approximately 5,684 grams. Photographs of the bags of counterfeit pills follow:





- b. A Smith and Wesson firearm, bearing serial number DVX6818, loaded with rounds of ammunition. Photographs of the firearm and ammunition follows:



CONCLUSION

75. Based on the foregoing, there is probable cause that SCHUYLER OPPENHEIMER has violated: (Count One) 21 U.S.C § 841(a)(1),(b)(1)(viii), by possessing with intent to distribute 500 grams or more of a mixture and substance containing methamphetamine; and (Counts Two and Three) 18 U.S.C. § 1343, by committing wire fraud through the submission of false information and documents in support of his PPP loan applications.

Attested to be telephone in accordance with Federal Rule of Criminal Procedure 4.1 on July
____ 18th ____, 2024.

Eric D. Poalino /by Paul G. Levenson
Special Agent Eric D. Poalino
Federal Bureau of Investigation

Attested and subscribed by telephone in accordance with Federal Rule of Criminal Procedure 4.1
on July ____ 18th ____, 2024.





Hon. Paul G. Levenson
United States Magistrate Judge